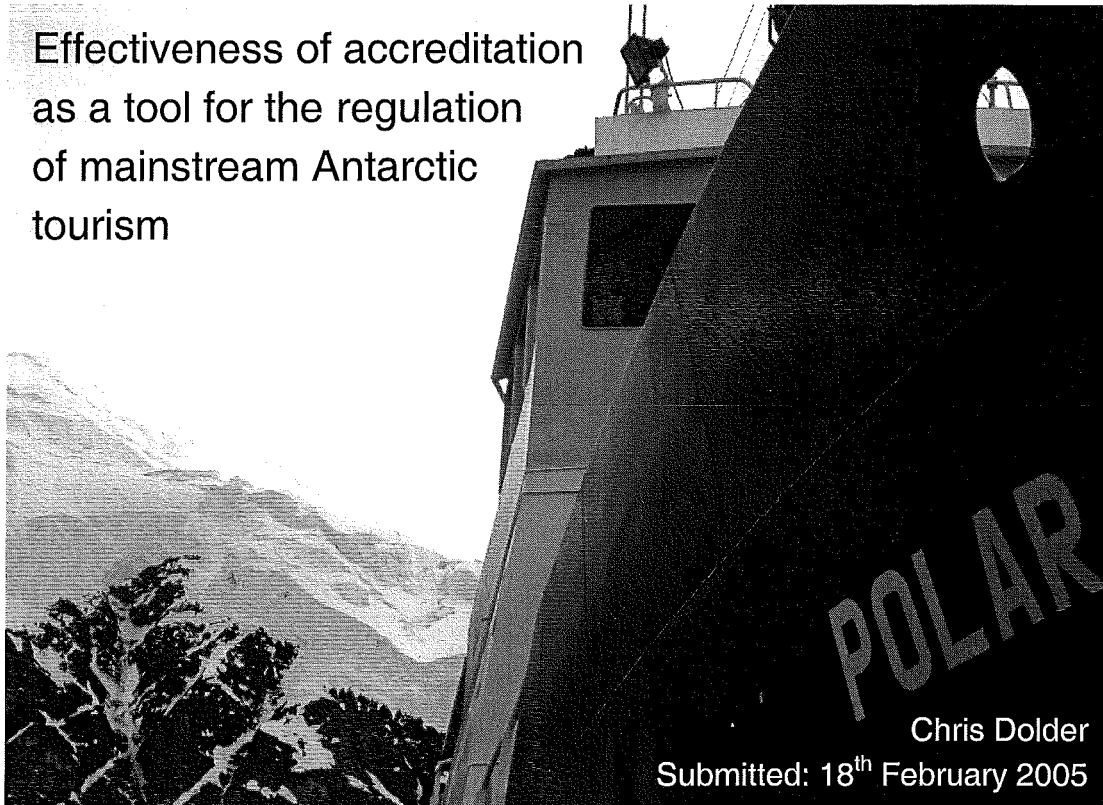


Effectiveness of accreditation  
as a tool for the regulation  
of mainstream Antarctic  
tourism



Chris Dolder

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**ABSTRACT**

Minimisation of cumulative impact resulting from tourism activities in Antarctica is a key issue and currently subject of debate. This paper assesses the strategic and mechanistic components of various accreditation scenarios to determine the effectiveness of accreditation as a tool for the regulation of mainstream Antarctic tourism. Perspectives of stakeholders from government, National Antarctic Programmes, non-governmental organisations, and tour operators are presented in balanced discussion. This study concludes that the most effective scenario describes the implementation of a voluntary accreditation scheme, strongly endorsed by the Antarctic Treaty Consultative Meeting (ATCM) and managed by IAATO.

## ACKNOWLEDGEMENTS

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- **Elaine Prior**, Environment and Research Officer of Aurora Expeditions
- **Alan Hemmings**, Senior Advisor to the Antarctic and Southern Ocean Coalition (ASOC) and Member of the Intersessional Contact Group on Accreditation
- **Trevor Hughes**, Head of the Antarctic Policy Unit, NZ Ministry for Foreign Affairs and Trade (MFAT) and Representative of the New Zealand Government at the Antarctic Treaty Consultative Meeting
- **Gillian Wratt**, Senior Operator for the Ministry for Environment (MfE) and Chair of the IAATO Annual General Meeting
- **Lou Sanson**, CEO of Antarctica New Zealand and Member of the Advisory Board for Gateway Antarctica

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## INTRODUCTION

Tourism was first raised for discussion at an Antarctic Treaty Consultative Party Meeting (ATCM) in 1966 at ATCM IV in Santiago (ASOC, 2002), though it received relatively little attention until the 1990s. At this time more detailed information concerning tourism activities became freely available. From this point on, the topic began to appear regularly on the ATCM agenda provoking more discussion amongst Antarctic Treaty Consultative Parties (ATCPs) and other interested organisations. The formation of the International Association of Antarctic Tourist Operators (IAATO) in 1991 sent a strong message to the ATCPs that tourism had established itself in the region. In the same year, the ATCM adopted the Protocol for Environmental Protection (1991) reinforcing their commitment to environmentally sustainable operation of all activities in Antarctica, including tourism.

Since 2001, debate has focused upon the management and regulation of mainstream Antarctic tourism, discussion of which originates from a recommendation of ATCM XXIV and subsequent debate at ATCM XXV concerning a further Annex to the Environmental Protocol specific to tourism (ATCM XXV, 2002).

Concerns highlight the seemingly exponential trend of rising tourist numbers, increasing growth rates, rapidly diversifying activities and the perception that the Environmental Protocol, 1991 (hereafter known as the Madrid Protocol) fails to provide a sufficient basis for the regulation of tourism - a view shared *inter alia* by ASOC and the Australian government (ASOC, 2004c, Australia ATME Delegation, 2004). This concern originates from the fact that the Madrid Protocol suffers from the generic limitations of any international treaty – it cannot cover everything in advance, and it makes certain assumptions about the existing baseline regulation to which it then adds. The Protocol is not designed specifically for the regulation of tourism, or indeed the regulation of science. The assumption of the Protocol is that the basic modalities of human activity in Antarctica are resolved elsewhere. What the Protocol does is then add a layer of regulation for the specifically environmental facet of already-regulated activity. But for tourism there is nothing behind the Protocol. The regulatory concerns about tourism are not in any case restricted to environmental issues, and the activity is the fastest growing in the region. Tourism thus poses particular problems for the Protocol which are not found in relation to, for example, national science programmes (Hemmings, A., pers. comm., 2005).

IAATO has reported an increasingly widening gap between government policy and approaches to the operational management of tourism, as activities continue to increase within the region (IAATO, 2004a).

Views on the management and regulation of tourism differ both conceptually and mechanistically between stakeholders representing governments, National Antarctic Programmes (NAP), regional organisations, such as IAATO and the Antarctic & Southern Ocean Coalition (ASOC), and the tour operators themselves.

Opinions are voiced at ATCMs, Antarctic Treaty Meetings of Experts (ATMEs), Intersessional Contact Groups (ICGs) and through published papers addressing both strategic and mechanistic facets of this debate.

### ***THE STRATEGIC CONTEXT FOR REGULATION***

The development of a strategic context for tourism regulation is necessary to subsequently ground any future regulatory regime, including mechanisms of accreditation.

Debate and decision-making are required to answer some of the complex questions posed by tourism in the Antarctic, concerning acceptable limits, intensity of activities, spatial and temporal distribution, and perhaps even, what types of activity should be permitted (Hemmings, A., pers. comm., 2005).

There are no easy answers; the eventual outcomes likely to be negotiated compromises. More challenging still is the application of value judgements to debate of an issue, such as activity preclusion, provoking a complete disparity of opinion. For example, some parties believe specific activities should be prohibited (ASOC, 2004b, New Zealand Ministry for Foreign Affairs and Trade, 2005), whereas others have a nervousness to preclude any activities, if they pass EIA requirements (Mortimer, G., pers. comm., 2005, Prior, E., pers. comm., 2005, Sanson, L., pers. comm., 2005, Wratt, G., pers. comm., 2005).

The ATCM, widely regarded as the key forum for addressing the management of Antarctica, must achieve clarity around the strategic context of regulation; to draw lines in the sand demarcating its stance on tourism activities in the region. It must reach an agreed position on the ethics of self-regulation and determine its future as it defines roles and responsibilities within a regulatory framework.



***MECHANISTIC COMPONENTS OF AN ACCREDITATION SCHEME***

Mechanisms for the regulation of tourism have been suggested and discussed by both NGOs and ATCPs. *Inter alia*, they include the establishment of:

- New legislation
- Accreditation schemes
- Departure State regimes
- Positive discrimination against non-industry association operators
- Limits or capping of tourist numbers and/or vessels in the region
- Restricted sites, banning tourism activities (for reasons of environmental protection)

Rarely are both the strategic and mechanistic facets of mainstream tourism regulation addressed at the same time and in any great detail. This may be attributable to the fact that there exists a difference of opinion between parties discussing this issue. ASOC suggests a definition of what is a necessary and sufficient level of tourism in the region that predates any discussions about specific tools (e.g. accreditation schemes) designed to achieve acceptable levels of activity (Hemmings, A., pers. comm., 2005). Another perspective offered by IAATO, suggests that waiting until a strategic direction is agreed by ATCPs may create a delay long enough to negate the effectiveness of any regulatory mechanism subsequently devised (Mortimer, G., pers. comm., 2005).

**In summary:**

- Tourism is well established
- It is actively discussed at the highest level
- Formal management & regulation is the present focus of attention
- Both strategic and mechanistic components of regulation need to be discussed. In what order (or in parallel) is yet to be determined by ATCPs.

## SCOPE AND RATIONALE FOR THIS PAPER

This paper seeks to examine the effectiveness of an *accreditation scheme* as a practical tool for regulation of the mainstream tourism industry in Antarctica. The objectives, benefits and likelihood of realistic implementation of any scheme are placed under scrutiny.

An accreditation scheme has been suggested as one mechanism to regulate mainstream tourism. It is examined in this context only. This paper does not seek to evaluate the issue of tourism regulation *per se*, other than focusing on the relevance and contribution of an accreditation scheme to regulation efforts. Neither does it seek to make value judgements of the presence of tourism in Antarctica, nor the performance of tourism operators within the region.

Attention is first levelled at mainstream tourism as it is responsible for the largest volume of tourism and non-governmental 'traffic' in Antarctica and therefore most likely to cause impact. The dominant variant of mainstream tourism is sea-borne.

No definition of the cut-off point between mainstream tourism and private adventure tourism is universally adopted. Thus, for the purposes of this paper, mainstream sea-borne tourism is characterised by the operation of larger ships (>40 passengers), managed by established operators and does not include smaller sailing yachts carrying approx. 12 passengers or less.

Air-borne over-flight and fly-sail tourism activities remain a negligible component of mainstream tourism, with over-flights making virtually no impact whatsoever.

The regulation of adventure tourism is not the focus of discussion in this paper, simply because the returns against the investment required to regulate the very low percentage of small-scale extreme adventure activities is questionable, if not extremely doubtful. It is much, much harder to regulate random individuals than established organisations.

-----

This paper will seek to answer the following key questions:

- What role will an accreditation scheme play in the regulation of Antarctic mainstream tourism and is it sufficient?
- How well will an accreditation scheme achieve its objectives?
- Strategically, how valuable / effective is an accreditation scheme at meeting the longer-term challenges facing the ATS?

### **DEFINITIONS**

The definitions and interpretations of 'regulation' and 'accreditation' are not uniformly shared amongst interested parties; therefore, for the purposes of this paper, regulation and accreditation will be defined thus:

- *Regulation* is the governmental ratification of principles, standards and/or mechanisms, having the force of law, designed to govern the conduct and proper functioning of an industry (American Heritage Dictionary, 2005).
- *Accreditation* is a procedure by which an authoritative body gives formal recognition that a body or person is competent to carry out specific tasks (UK ISO, 1996).

#### **In summary:**

- Strategic and mechanistic aspects of an accreditation scheme are the focus, considered in the context of a broader requirement for tourism regulation
- Attention is levelled at mainstream tourism (of which the majority is sea-borne)
- The role and effectiveness of accreditation will be scrutinised

## ***ASSUMPTIONS***

This paper does not attempt to encompass all of the issues surrounding tourism in the Antarctic, nor does it intend to provide commentary on individual operators. Work has been predicated on a number of assumptions, upon which further concepts and discussions are based. These assumptions are outlined below:

- Tourism has firmly established itself as a significant activity in the Antarctic and will continue in future
- No. of tourists visiting (& landing) in Antarctica will continue to increase
- Overall, tourism activities will continue to diversify (though there may be differences between variants of tourism)
- Little or no expansion of sea-borne tourism gateways is expected
- Expansion of air-borne / land-based tourism gateways is expected
- Commercial drivers are shifting the market toward use of larger ships
- The Madrid Protocol (& EIA) is not a sufficient or consistent enough basis to regulate tourism

## **APPROACH**

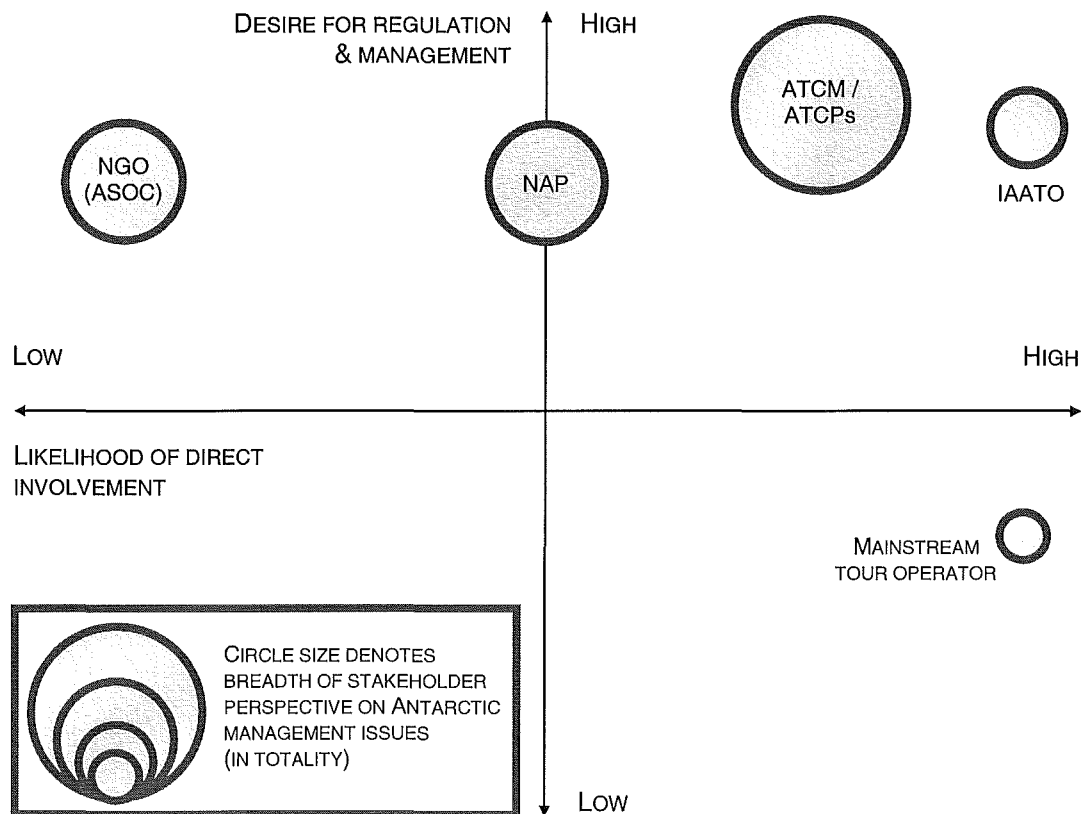
In considering the effectiveness of an accreditation scheme as a tool for the regulation of Antarctic tourism, the perspectives of a variety of stakeholders have been sought (see Table 1 and Figure 1).

**TABLE 1: DETAILS OF STAKEHOLDER INVOLVEMENT IN THIS WORK (INCL. THEIR VARIOUS ROLES – PAST AND PRESENT, METHOD AND TIMING OF THEIR ENGAGEMENT).**

STAKEHOLDER	ROLES (PRESENT & PAST)	ENGAGEMENT	DATE
GREG MORTIMER	<ul style="list-style-type: none"> <li>• EXECUTIVE COMMITTEE MEMBER FOR IAATO</li> <li>• MD, AURORA EXPEDITIONS</li> <li>• PREVIOUSLY DIRECTOR, GREENPEACE (AUSTRALIA)</li> </ul>	INTERVIEW (SYDNEY)	30 <sup>TH</sup> JAN 2005
ELAINE PRIOR	<ul style="list-style-type: none"> <li>• RESEARCH &amp; ENVIRONMENT MGR, AURORA EXPEDITIONS</li> </ul>	INTERVIEW (SYDNEY)	31 <sup>ST</sup> JAN 2005
GILLIAN WRATT	<ul style="list-style-type: none"> <li>• CHAIR OF IAATO ANNUAL GENERAL MEETING</li> <li>• TOURISM EXPEDITION LEADER (ANTARCTIC)</li> <li>• SENIOR OPERATOR, MINISTRY FOR ENVIRONMENT</li> <li>• PREVIOUSLY CEO, ANTARCTICA NEW ZEALAND</li> <li>• PREVIOUSLY CHAIR OF COMNAP</li> </ul>	INTERVIEW (WELLINGTON)	12 <sup>TH</sup> -13 <sup>TH</sup> FEB 2005
ALAN HEMMINGS	<ul style="list-style-type: none"> <li>• SENIOR ADVISOR, ASOC</li> <li>• MEMBER OF ICG FOR ACCREDITATION</li> <li>• CHAIR, IUCN ANTARCTIC ADVISORY COMMITTEE</li> </ul>	INTERVIEW (TELECON)	14 <sup>TH</sup> FEB 2005
TREVOR HUGHES	<ul style="list-style-type: none"> <li>• HEAD OF THE ANTARCTIC POLICY UNIT (MINISTRY FOR FOREIGN AFFAIRS &amp; TRADE)</li> <li>• NZ REPRESENTATIVE TO ATCMs</li> </ul>	EMAIL COMMUNICATION	9 <sup>TH</sup> -14 <sup>TH</sup> FEB 2005
LOU SANSON	<ul style="list-style-type: none"> <li>• CEO, ANTARCTICA NEW ZEALAND</li> <li>• ADVISORY BOARD MEMBER FOR GATEWAY ANTARCTICA, CANTERBURY UNIVERSITY</li> </ul>	INTERVIEW (CHRISTCHURCH)	16 <sup>TH</sup> FEB 2005

Published journals, reports, and information and working papers from ATCMs and ATMEs supplement the primary research conducted to establish the views of key stakeholders.

**FIGURE 1: CHART ILLUSTRATING RELATIVE POSITIONING OF STAKEHOLDERS INVOLVED IN THIS WORK WITH RESPECT TO THEIR DESIRE FOR A MORE REGULATED INDUSTRY AND THEIR LIKELIHOOD OF INVOLVEMENT IN ANY FUTURE REGULATION MECHANISM. THE BREADTH OF PERSPECTIVE OF EACH STAKEHOLDER (ACROSS ALL ANTARCTIC MANAGEMENT ISSUES) IS SYMBOLISED BY THE SIZE OF THE CIRCLE. THIS PROVIDES A USEFUL INDICATOR IN TERMS OF THEIR UNDERSTANDING OF THE BIG-PICTURE AND THE POTENTIAL WEB OF RELATED OR DEPENDENT ISSUES.**



Stakeholder positioning gives an early indication of their potential views on the ease of implementation and effective governance of an accreditation scheme.

## ***PROJECT LIMITATIONS***

The depth and breadth of this paper is constrained by both an intentionally limited scope, to focus the discussion, and external factors either imposed upon or beyond the control of the author. These factors include:

### Access to stakeholders

Stakeholder involvement has been essential to the production of this paper – to provide the material necessary to present a balanced view. Not surprisingly, stakeholders at the hub of discussions are not always readily accessible. The production of this paper has had to account for this limitation. It is unfortunate that no representative from a non-IAATO operator was available for inclusion within this study.

### Interconnected issues

Attempting to look at the issues described in this paper in isolation would be folly as all of them are affected overtly or more subtly by other factors. This web-like arrangement of issues is perhaps too complex to dissect in any great detail given the timescales of this work. Any interpretation should be mindful of the complex inter-relationships that influence the mainstream tourism industry and its ongoing management by ATCPs under the auspices of the ATS.

### Specialist knowledge

Many of the issues in this paper are directly or indirectly related to existing and/or proposed legal regimes, both nationally (through domestic legislation) and internationally (as stipulated by the Antarctic Treaty System). Specialist expertise is required to interpret in detail the implications, corollaries and connotations of the legislative landscape within which any kind of regulatory mechanism would operate. Therefore, in the absence of specialist skills, this paper has been necessarily high-level in some respects.

## CONTEXT FOR MAINSTREAM ANTARCTIC TOURISM

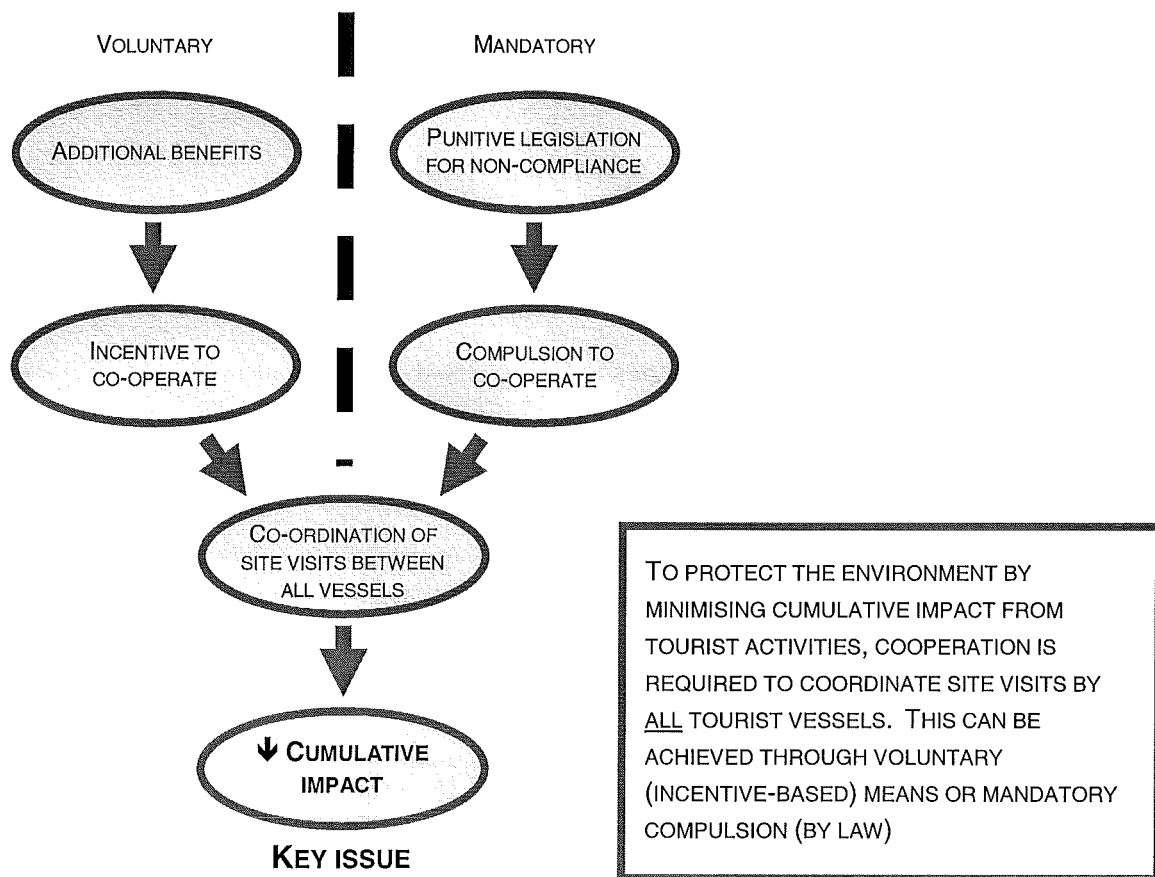
It is important to clearly establish the need for a regulatory mechanism within the mainstream Antarctic tourism industry. Issues exposing the ATS may support the case for change and the introduction of a system, scheme or mechanism to address them.

A summary of the current state of play is also outlined to provide context within which an accreditation scheme might operate.

### ***THE NEED FOR REGULATION***

The requirement for regulation is driven principally by the key issues cumulative impact, vessel co-ordination and the lack of legislation to mandate and more tightly connect the activities of the Antarctic tourism industry with the ATS.

FIGURE 2: DIAGRAM ILLUSTRATING THE ISSUES DRIVING A NEED FOR REGULATION





## MINIMISATION OF CUMULATIVE IMPACT

The issue central to the requirement for regulation concerns the environmental damage from cumulative human impact as a corollary of tourism activities. The causes of human impact are well documented, but the extent of the cumulative impact caused by tourism activities remains unknown.

This issue highlights a weakness in the system of Environmental Impact Assessment (EIA) introduced by the Madrid Protocol, which obligates every visiting 'event' or 'expedition' to Antarctica (including mainstream tourism) to complete an EIA. For tourism, these concern activities of no more than minor or transitory impact. EIAs are required by permitting governments to obtain authority to proceed. However, each individual EIA, submitted by a tour operator is considered discretely as there is no system to consider impact of activities cumulatively.

Perhaps then, it is surprising that there is no overwhelming body of scientific evidence directly linking the activities of tourism with cumulative impact. Past research has suggested that there is no evidence of human impact on breeding success of penguin colonies exposed to relatively high levels of human disturbance (Cobley & Shears, 1999). However, logically, the greater the level of tourist 'traffic' visiting sites of interest, the greater the likelihood of human impact occurring at those sites.

Bastmeijer and Roura note that the sites most frequented by operators, for reasons of accessibility, cost and tourist appeal, tend to be in the Peninsula region. These sites are often ice-free and it is this characteristic that can predispose them to rich biological diversity. Alternatively, they may be of interest for outstanding natural beauty, intangible wilderness value, historic or scientific importance. These sites are potentially vulnerable to cumulative impact (Bastmeijer & Roura, 2004).

Indeed, the view that significant cumulative effects can arise from individually insignificant actions, what Sontagg refers to as "destruction by insignificant increments" (Sontagg *et al.*, 1987) should be borne in mind. No matter how much operators work to reduce the human footprint created by their expeditions, the sheer number of expeditions and the growth rate, may cancel out that reduction (Hemmings, A., pers. comm., 2005).

To help minimise cumulative impact caused by tourism activities the industry must work hard to co-ordinate visits to sites by its vessels.

## **MANAGEMENT AND CO-ORDINATION OF SITE VISITS BY TOURIST VESSELS**

The co-ordination of all tourist vessels landing passengers in the region is critical to control the frequency and intensity of human impact at destination sites. Co-ordination of site visits ensures tourism activity is well distributed and over-crowding at a single site does not occur. This is essential to:

- Minimise human impact (in the spirit of the Madrid Protocol)
- Optimise the safety, timeliness and effectiveness of operations
- Preserve the wilderness experience for the passengers

Unfortunately, pan-industry co-ordination does not exist. Not all operators taking vessels to the region are members of IAATO and thus are not obligated to abide by the Association's by-laws to share schedule information. Vessel co-ordination and scheduling is widely believed to be reaching capacity within the Antarctic Peninsula (Mortimer, G., pers. comm., 2005, Prior, E., pers. comm., 2005), placing the IAATO guiding principle of no more than one vessel visiting any one site at any one time, under pressure.

When capacity is reached, there is no mandate to obligate operators to maintain this principle; rather the industry relies upon the perceived benefits of membership or threat of expulsion from the Association. By-laws and guiding principles of IAATO are for the adherence of a voluntary membership and are not legally binding or enforceable. For IAATO-member operators, the only deterrent for breach of this principle is withdrawal of membership. There is no deterrent for non-IAATO operators.

Furthermore, should a requirement arise to restrict or prevent access of tourism vessels to specific sites within the Antarctic for reasons of environmental protection, there is no mechanism to achieve this.

An enforceable system may be required to uphold one of IAATO's central tenets; no more than one vessel visiting any one site at any one time.

**TIGHTER INTERACTION BETWEEN THE TOURIST INDUSTRY AND THE ATS**  
(VIA NATIONALLY ENACTED LEGISLATION)

Currently, the Antarctic Treaty cannot control the threat posed by the cumulative impact of tourism, undermining the credibility of the ATCM and the ATS to manage activities across the region. The lack of formal interaction between the ATS and the tourism industry represents a significant gap (New Zealand ATME Delegation, 2004). The presence of a legal vacuum or ambiguity may result in the creation of other international agreements taking precedence. This is as undesirable to ATCPs as it is to IAATO.

Without a solid legal basis, the enablement of regulatory measures compelling all operators to adhere to pre-defined standards designed to limit impact, will be ineffective. They cannot be mandated and thus may be considered hortatory guidelines only.

**In summary:**

- The issues is the minimisation of impact caused by mainstream tourism activities
- Madrid Protocol doesn't sufficiently address the minimisation of cumulative impact
- Co-ordination of site visits by all tourism vessels – currently absent – would greatly assist the achievement of this objective
- To enforce such a requirement, tighter interaction between the ATS and the tourism industry is required

## **SUMMARY OF THE CURRENT INDUSTRY STATUS**

In order to understand how an accreditation scheme might operate within the Antarctic tourism industry it may be useful to briefly understand the current status of the industry, including *inter alia*:

- An overview of industry trends,
- An analysis of strengths, weaknesses, opportunities and threats
- An outline of organisations significant to Antarctic tourism.

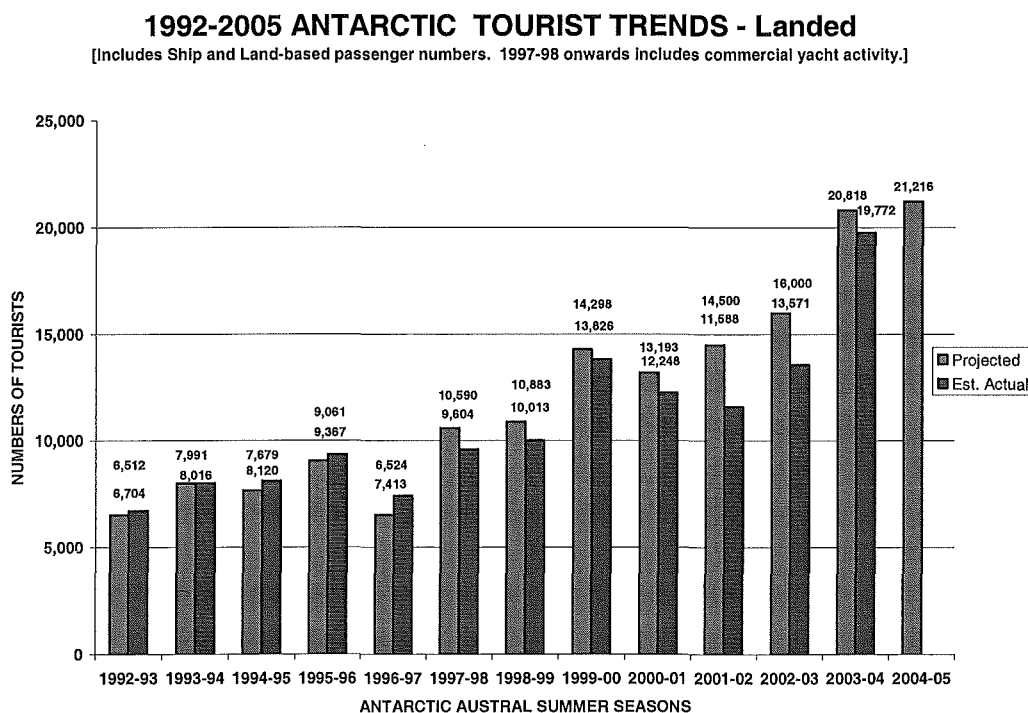
## **TOURIST TRENDS**

Historical data for absolute numbers of tourists landed on Antarctica (see Figure 3) illustrates an obvious upward trend since the 1992/3 season, becoming more marked in recent years. Concern has been voiced repeatedly over the apparently increasing rate of growth (ASOC, 2004a, Hemmings, A., 2004, de Pooter, M., pers. comm., 2005). Trends are well documented by both IAATO and commentators on tourism (Bastmeijer & Roura, 2004, Hemmings, A., 2004, IAATO, 2004d/e.). They serve only as background for this report, illustrating the upward trend of the market.

Those interpreting trend data for numbers of tourists landing in Antarctica should be cognisant of the fact that these numbers tell only part of the story. Full analysis should take account of the type of activities tourists are engaged in whilst ashore, the duration and extent of these activities, their intensity, reversibility and the specific environmental status and sensitivity of the sites being visited (IAATO, 2003, de Pooter, pers. comm., 2005). This is clearly a very complex problem where not all data may be available.

Despite these caveats, it is not illogical to assume that the greater the number of tourists landing, the greater the potential for environmental impact, though, this should not be used as an absolute.

**FIGURE 3: CHART ILLUSTRATING THE UPWARD TREND IN NUMBERS OF TOURISTS LANDED ON ANTARCTICA SINCE 1992/3 SEASON UNTIL THE PRESENT DAY. SOURCE: IAATO WEBSITE, TRENDS 1992-2005.**



Antarctic tourism is not a new event. The era of modern ship-based tourism began in 1966, when Lars Eric Lindblad visited Antarctica aboard the Argentine vessel *Lapataia*, returning in 1970 in his purpose-built vessel, the *Lindblad Explorer* (Bauer, T., 2001). Today's mainstream tourism model is well established and in the vast majority of instances, professionally operated.

Data discussed by Bastmeijer and Roura indicates that until 1991 tourism levels had remained reasonably stable, with little evidence of accelerating growth. Not until 1991 did tourism begin to jump significantly. This could be attributed to increasing interest in the region from operators or the improved availability and accuracy of information through the formation of IAATO.

It is the increase in numbers of tourists visiting Antarctica and their potential cumulative impact upon the environment that prompted the New Zealand government to adopt a precautionary tourism policy (see Appendix A). Their policy seeks to limit tourism activities within the Ross Sea Region and actively discourages the expansion of tourism. Furthermore, the government has openly stated it would support visitation limits (or capping) where cumulative

impacts are likely to lead to deterioration of the environment (NZ Ministry for Foreign Affairs and Trade, 2005).

This precautionary approach is influenced, in part, by a lack of direction from the ATCM with respect to tourism and the potentially destabilising nature tourism has upon sovereignty issues in the region (though this is not the subject of this paper).

In the face of such protective measures, Greg Mortimer suggests it is important to put things into perspective. He alludes to this example; some 20,000 people landed on Antarctica in 2003-04 compared to approximately 2 million visitors to the Royal National Park south of Sydney. At 13,661,000 sq. km Antarctica is 85,381 times the size of Royal NP (Mortimer & Jabore, 2005).

### **ACTIVITY DIVERSIFICATION**

Frequently, fears are raised with respect to the diversification of tourism activities (UK ATME Delegation, 2003) and it has been argued that tourism activities that can only be conducted in Antarctica should occur there, i.e. “seeing snow petrels vs. cross-country vehicle use” (ASOC, 2004b). This latter point may try to develop some consistency between the approach taken by science activity selectors and the selection of tourism activities. However, in reality, fears relating to diversification more accurately refer to the activities of adventure tourism, which represents a tiny proportion of the total ‘tourist traffic’ to Antarctica. Mainstream tourism, representing by far the largest proportion of non-governmental activities, has diversified little in recent years. Denise Landau, Executive Director for IAATO argues that “kayaking, climbing, skiing, scuba diving and camping have all become the travel norm by IAATO Members for at least the last 13 years” (IAATO, 2004b).

Respected owner-operators and expedition leaders within the industry have voiced their distaste for activities (that would probably satisfy an EIA) that are inconsistent with the intrinsic values of Antarctica (Mortimer, G., pers. comm., 2005, Wratt, G., pers. comm., 2005).

## **OTHER TRENDS**

Alongside the key indicator of passenger numbers visiting Antarctica, other trends are developing within the industry.

### Use of larger ships

IAATO has expressed its concern over the growing number of non-IAATO operators taking interest in the region, conducting sea and land-based tourism activities (IAATO, 2003, IAATO 2004a, Mortimer, G., pers. comm., 2005). These include large (>500 passenger) vessels and even small aircraft operating out of the Patriot Hills camp run by Adventure Network International (ANI).

An upward trend in the number of large ships visiting the Antarctic may also be accompanied by an increase in the total number of departures per season as visits to the region become established on their schedules. Consistently more large ships of non-members than members are operated in the region.

In a recent paper to the ATME in Norway (2004), the UK suggested that cost and perceived operational freedoms were potential drivers for opt out (UK ATME Delegation, 2004). More worrying still is the lack of governance regime to effectively control, monitor and engage the operators of the ever increasing number of large ships. They fall outside of the jurisdiction of IAATO and any formal Treaty mechanism.

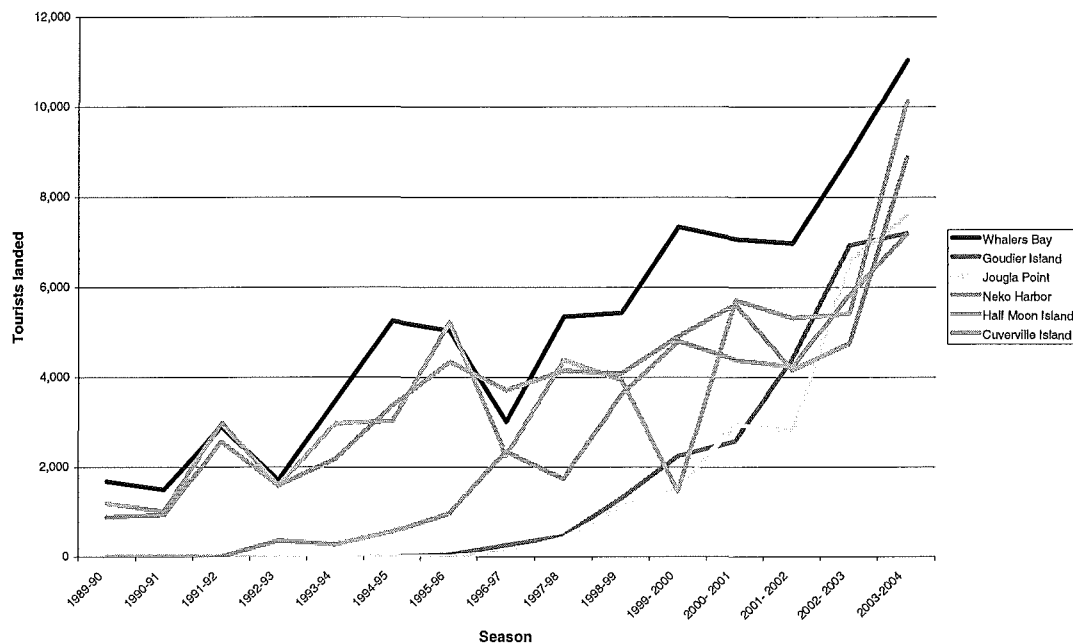
IAATO has actively discouraged the use of large vessels landing passengers, though if these vessels are operated by non-members there is little that can be done to stop this activity. Therefore, the cumulative impact experienced at some of the more popular destinations (capable of receiving large ships) may be greatly accelerated. It is also unclear, whether non-members adhere to the guidelines and best-practice promoted and promulgated amongst members by IAATO.

A more optimistic view, speculates that the expected expansion in the number of large ships visiting Antarctica will be naturally curtailed by the practicalities of landing large numbers of passengers in small Zodiac craft. Large vessels will take much longer to land passengers and therefore will be able to visit less sites (Prior, E., pers. comm., 2005).

### Tourist traffic (per site)

Data provided to IAATO through post-visit site reporting, shows that of the 160 sites visited by tourist operators during the 2003/4 season, traffic to the most popular sites is sharply increasing compared to recent years (see Figure 4). The trend is almost exponential. Undoubtedly, traffic is spreading to new sites; however, there may be cause for concern at this pattern of growth at the most popular sites, especially if more large ships enter the region run by non-IAATO operators. Cumulative impacts may be greatly exacerbated before monitoring efforts are able to highlight the threat.

**FIGURE 4: CHART ILLUSTRATING THE INCREASE IN VISITOR TRAFFIC TO THE MOST POPULAR SITES VISITED BY TOURIST VESSELS 1989 – 2004. SOURCE: IAATO DATA, FROM WEBSITE – COMBINING IAATO TOP 5 PENINSULA SITES 1989-2003 WITH NUMBER OF VISITORS PER SITE, PER ACTIVITY 2003-2004 (ONLY SMALL BOAT LANDINGS WERE COUNTED FROM THIS DATA).**



### Length of visitation period (season)

Often, vessels chartered by operators for Antarctic tourism are chartered for a block of time (Prior, E., pers. comm., 2005), in which back-to-back expeditions are operated (to make the most cost-effective use of the vessel). IAATO overview data for 2003-2004 illustrates a broad trend of increasing numbers of departures (or voyages) by each vessel (excluding small sailing vessels). The back-to-back nature of expeditions indicates that the block of time these vessels are booked for is increasing, which indicates a lengthening of the season.



The realistic length of the season is determined by the weather and ice conditions. However, operators wishing to make the most of the season, by offering trips on what may have traditionally been considered to be the shoulder of the season are increasing the period of time that sites may receive visits per season. This may be one factor resulting in increased visitor numbers to the most popular sites. It may increase the length of exposure the natural fauna and flora have to humans.

From a precautionary perspective this could be argued to be exacerbating human impact, however, whether this actually has a negative effect is unknown.

**In summary:**

- Increasing numbers of tourist and vessels visiting the region
- Diversification of mainstream tourism activities – relatively stable for 10+ yrs
- Increasing use of larger ships, often run by non-IAATO operators
- Increasing tourist traffic (by site) raising concerns for cumulative impact
- Lengthening of season for operators

## STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS

It is worth briefly examining the current system, noting the assets and flaws as they currently stand, as well as the prospects and challenges that lie ahead, to provide a better picture of the environment into which an accreditation system may be embedded. Table 2 illustrates some of these points.

Not all stakeholders would view the strengths, weaknesses, opportunities and threat in the same manner, dependent upon their perspective.

**TABLE 2: OUTLINE OF THE STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS CURRENTLY FACING THE MAINSTREAM TOURISM INDUSTRY.** SOURCE: UK ATCM XXVI DELEGATION, 2003, AUSTRALIA ATME DELEGATION, 2004, HEMMINGS, A., 2004, UK ATME DELEGATION, 2004, NEW ZEALAND ATME DELEGATION, 2004.

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"><li>• DOCUMENTED AND DISSEMINATED OPERATIONAL PROCEDURES AND GUIDELINES PRODUCED BY IAATO</li><li>• EXPERIENCE AND PASSION OF OPERATORS TO UPHOLD AND EXCEED PRINCIPLES OF THE MADRID PROTOCOL</li><li>• SINGLE CONTACT POINT FOR THE INDUSTRY, PROVIDED BY IAATO</li><li>• TRIED AND TESTED METHOD OF SCHEDULING TOURIST ACTIVITIES TO ADHERE TO THE PRINCIPLE OF ONE SHIP IN ONE PLACE AT ONE TIME (THOUGH THIS IS COMING UNDER INCREASING PRESSURE DUE TO SHEER VOLUME OF ACTIVITY AND NON-IAATO OPERATORS</li><li>• WELL MONITORED &amp; REPORTED MAINSTREAM TOURISM OPERATIONS PROVIDING ACCURATE &amp; RELIABLE DATA, ACCESSIBLE THROUGH IAATO</li><li>• PERCEPTION OF INDUSTRY BY TOURISTS</li></ul>	<ul style="list-style-type: none"><li>• INDUSTRY EXPOSURE TO ROGUE, MAVERICK OR NON-COMPLIANT OPERATORS. IAATO HAS NO LEGAL POWERS BEYOND ITS BY-LAWS FOR MEMBERS AND NO POWERS TO TACKLE NON-MEMBERS. ATS ONLY HAS POWERS OF ENFORCEMENT THROUGH THE DOMESTIC LEGISLATION OF SIGNATORY STATES.</li><li>• LACK OF LEGAL BASIS TO ENSURE COMPLIANCE TO SELF-CREATED INDUSTRY STANDARDS</li><li>• VOLUNTARY MEMBERSHIP AND LACK OF COVERAGE OF SMALLER ONE-TIME EXPEDITIONS (INDICATIVE OF ADVENTURE TOURISM OR PRIVATE, SOMETIMES COMMERCIALY FINANCED ENDEAVOURS)</li><li>• POTENTIALLY NEGATIVE PERCEPTION OF IAATO AS A "SMALL COTERIE OF MATERIALLY SELF-INTERESTED WESTERN CORPORATIONS, OR PARTICULAR STATES, APPROPRIATING RIGHTS TO WHAT IS FOR MOST OF THE PLANET, A GLOBAL COMMONS" (HEMMINGS, A., 2004)</li></ul>

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**TABLE 2 (CONT): TABLE OUTLINING THE STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS CURRENTLY FACING THE MAINSTREAM TOURISM INDUSTRY.** SOURCE: UK ATCM XXVI DELEGATION, 2003, AUSTRALIA ATME DELEGATION, 2004, HEMMINGS, A., 2004, UK ATME DELEGATION, 2004, NEW ZEALAND ATME DELEGATION, 2004.

OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• CLOSER, FORMAL INTERACTION WITH ATS (OR PERHAPS INCLUSION IN SOME WAY)</li> <li>• MOVE TOWARDS FORMAL OPERATOR CERTIFICATION AS PART OF AN ACCREDITATION SCHEME, CREATING BENEFITS FOR THE ATS, TOURISM INDUSTRY, OPERATORS AND TOURISTS</li> <li>• CLOSER WORKING PARTNERSHIP WITH NATIONAL ANTARCTIC PROGRAMMES TO ASSIST WITH SCIENTIFIC RESEARCH ACTIVITIES</li> <li>• INCREASING AWARENESS AND ADVOCACY OF ANTARCTICA THROUGH OUTREACH TO GENERAL PUBLIC (AS WELL AS PASSENGERS)</li> </ul>	<ul style="list-style-type: none"> <li>• SIDE-LINING OF IAATO BY OPERATORS OF LARGER SHIPS OR MISMANAGEMENT OF ANY IMPLEMENTATION OF AN ACCREDITATION SCHEME (OR BROADER REGULATORY FRAMEWORK) NEGATIVELY IMPACTING THE EFFECTIVE MANAGEMENT OF TOURISM ACTIVITIES ACROSS THE REGION AND BRINGING INTO QUESTION THE FEASIBILITY OF THE ASSOCIATION</li> <li>• PERCEPTION BY ATCPs OF TOURISM AS A THREAT TO THE ROLE OF THE ANTARCTIC TREATY – QUESTIONING ITS ABILITY TO EFFECTIVELY MANAGE ALL ACTIVITIES OCCURRING IN ANTARCTICA – PROVOKING UNNECESSARILY SEVERE RESPONSE</li> <li>• ACCUSATIONS OF TOURISM INDUSTRY PRESENTING A REAL AND PRESENT BIO-SECURITY RISK TO ANTARCTICA CULMINATING IN SEVERE RESTRICTIONS BEING PLACED UPON THE INDUSTRY BY ATCPs</li> <li>• NEGATIVE REACTION FROM TOURISM INDUSTRY OPERATORS BY ATCPs DUE TO PERCEPTION OF HUMAN IMPACT RESULTING FROM OPERATOR ACTIVITIES</li> <li>• CONFUSION AND MISINFORMATION GENERATED BY LINKAGE WITH EXPLOITS OF 'EXTREME' ADVENTURE TOURISM</li> <li>• OPERATION OF LARGER TOURIST VESSELS (USUALLY NOT ICE-STRENGTHENED) IN ANTARCTIC WATERS PRESENTS BOTH SAFETY, SEARCH &amp; RESCUE AND ENVIRONMENTAL ISSUES WHERE AN INCIDENT TO OCCUR</li> </ul>

## **INTERNATIONAL ASSOCIATION OF ANTARCTIC TOUR OPERATORS**

IAATO describes itself as “a member organisation founded in 1991 to advocate, promote and practice safe and environmentally responsible private-sector travel to the Antarctic” (IAATO, 2005).

The Association now comprises almost 70 members, representing *inter alia* ship-based, land-based and air tourism operators, which are collectively represented at the highest forum for the region – the ATCM. Membership of IAATO is voluntary for tour operators and not all companies active in the Antarctic choose to be affiliated.

IAATO represents “...a larger and more organised Antarctic tourism industry, highly conscious of operating within the regulatory framework of the Antarctic Treaty System and of the priority that system has always accorded to government-sponsored scientific research, has naturally sought to establish its credentials as a responsible actor in the region” (Murray & Jabore, 2004)

Most, if not all, ATCPs acknowledge the value of the Association and the positive, proactive efforts it has made to the improvement of Antarctic tourism operation – frequently exceeding the statutes of the Madrid Protocol. Currently, IAATO is the closest thing the region and industry has to a formal regulator – though its lack of mandate and the ethical debate about industry self-regulation may lead to change in future.

A brief overview of the Association’s achievements, strengths and limitations serves to demonstrate IAATO’s competence and the reality of its shortcomings. What implications this may have for any future involvement in an accreditation scheme will likely be the subject of debate and negotiation between the Association and the ATCPs.

### Achievements

- Definition of operational parameters by which members operate, including the creation of at least 16 sets of activity guidelines, operating procedures and by-laws. All are in a constant state of refinement
- Consistent record of proactive, leadership in the Antarctic tourism industry (and the ATS in this regard)

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- Support of NAP and search & rescue operations within the region. IAATO members have demonstrated they can play a broader role.
- Openness and enthusiasm to embrace the ATS, especially the Madrid Protocol, to share information with ATS and ATCPs. IAATO promotes open access to accurate and reliable information to the wider community – consistent with the central tenets of the ATS.
- IAATO provides a centralised co-ordination function for the entire industry operation in the Antarctic managing expedition scheduling and vessel co-ordination between its member (and in some cases, non-members, e.g. Orient Lines)

### Strengths of IAATO

- IAATO is more formally recognised by at least one ATCP (UK ATME Delegation, 2004) with their overt support of IAATO in precluding non-IAATO operators from visiting stations within their control. Other ATCPs and NAPs acknowledge the valuable role played by IAATO in its representation of the industry operators and its pursuit of improved standards of operation (Australian ATME Delegation, 2004, New Zealand ATME Delegation, 2004, Sanson, L., pers. comm., 2005).
- Development of significant corporate knowledgebase, formed from over 13 years of operation as IAATO. Additionally, individuals of member organisations represent a huge body of polar experience
- Central co-ordination point for ATS to engage industry
- Active collaborator with ATCPs in reporting, discussion and involvement through a variety of forums (ATCMs, ATMEs, ICGs etc)
- Central management authority for member operator by-laws, standards & guidelines, subsequently adopted by ATCM (with minor modifications) to become Recommendation XVIII – 1 Guidance for Visitors to the Antarctic, though still not approved under Article IX of the Treaty and is therefore not formally in force (UK ATME Delegation, 2004).

### Limitations of IAATO

- IAATO is not formally tied into the Antarctic Treaty System, limiting its authority and legitimacy on the global forum, despite its international representation of members
- Not a truly independent body, but more akin to a council of members. This makes it difficult to argue impartiality in decision-making and true objectivity, given the conflicting interests of commerce
- Lacks mechanisms to regulate non-members and has only restricted powers of withholding, removing or down-grading status of its members
- The membership base is only voluntary. Thus its by-laws, guidelines and best practices are hortatory and not legally binding
- The association may be perceived in some quarters as select or exclusive group representative of Western (more powerful) states

This paper acknowledges the value IAATO adds to the tourism industry in the Antarctic, however, at the same time it does not lose sight of the fact that the purpose of any accreditation scheme is not to provide authority or legitimacy to IAATO, but to encourage the adoption of the highest standards for the good of the environment and the wider community.

### **MANAGING CHANGE**

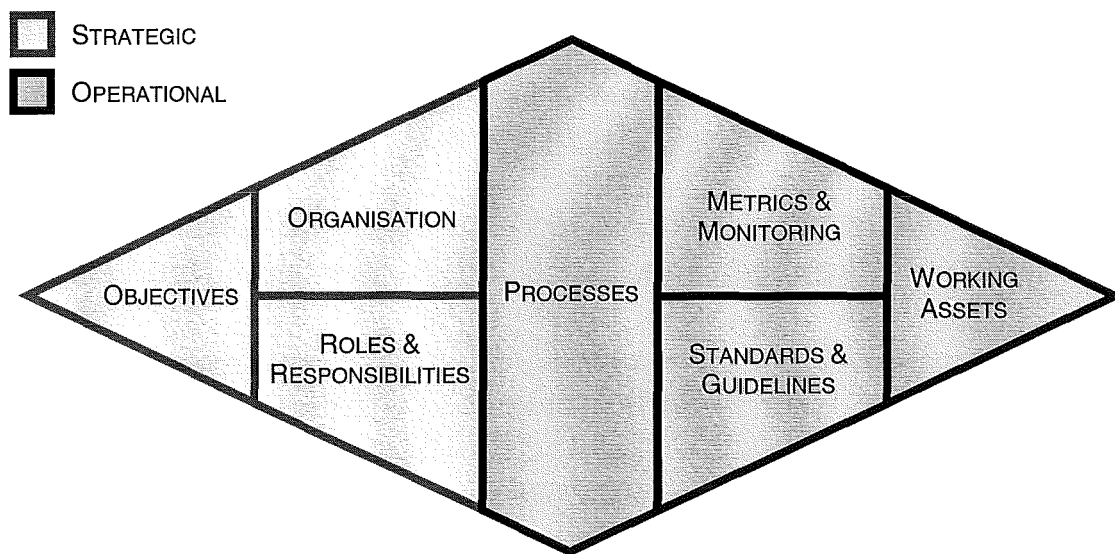
Increasingly, ATCPs are acknowledging the need to formally regulate tourism and that this regulation should be the primary responsibility of State Parties, with declining reliance on industry self-regulation (ASOC, 2004b, ATME Chairman, 2004).

Any transitioning, whereby ATCPs move into a more central role to govern tourism, should be managed carefully to take into account the potential disadvantages of any major restructuring of IAATO and its position as the representative industry body. The Chairman's report from the ATME on Tourism and Non-governmental Activities in Antarctica specifically noted the agreement stating "...there is merit in the maintenance of a strong, credible industry Association to ensure the implementation of consistently high standards amongst its member companies" (ATME Chairman, 2004).

## STRATEGY & MECHANICS OF ACCREDITATION

This section examines in more detail, the effectiveness of an accreditation system for the regulation of tourism, using an industry-proven governance model (see Figure 5), as an analytical framework to breakdown each component of strategic and operational governance.

**FIGURE 5: COMMERCIAL MANAGEMENT SYSTEM MODEL ILLUSTRATING COMPONENTS OF STRATEGIC AND OPERATIONAL GOVERNANCE. SOURCE: IBM BUSINESS CONSULTING SERVICES**



A strategic perspective of an accreditation scheme should address its objectives (or its mission), the type of organisation that will support it and the role and responsibilities of that organisation.

An operational or mechanistic perspective should address the more technical elements concerning the functioning of the tool, such as processes, standards & guidelines, metrics and monitoring and the various working assets required to operate an accreditation scheme.

Different stakeholders represent a variety of positions and schools of thought related to the strategy and operation of an accreditation system and/or the wider topic of regulation. Some of those positions will be outlined here.

## **STRATEGIC COMPONENTS**

A strategy for accreditation and/or the regulation of tourism more broadly should tackle the tougher, more fundamental questions, such as *inter alia*:

### Why?

Why have an accreditation scheme; what are its objectives and drivers?

### What?

Precisely what is it – what is its scope; what does it do & what does it not do?

### Who?

Who is involved in the operation of an accreditation scheme and who should be accredited?

## **OBJECTIVES FOR ACCREDITATION**

An accreditation scheme is defined as “a procedure by which an authoritative body gives formal recognition that a body or person is competent to carry out specific tasks” (UK ISO Guide 2, 1996).

Its objectives for the mainstream Antarctic tourism industry are:

- To ensure greater environmental protection and minimise the cumulative impacts of human activities as a result of tourism
- To certify, subject to fulfilling pre-defined conditions that a tour operator is competent to operate safely and effectively in the Antarctic region
- To ensure the standardisation and consistent application across the industry of agreed operational procedures, standards & guidelines, designed to limit human impact and protect the Antarctic environment
- To strengthen the credentials of operators as responsible actors in the region
- To demonstrate to potential consumers a mark of quality, experience and skill that can be relied upon to distinguish between non-accredited operators during decision-making



## **SCOPE OF AN ACCREDITATION SCHEME**

An accreditation scheme is a tool to assist in the process of regulating an industry. It provides a framework for operational standards – a more formal system of governance and a formalisation of a process (Prior, E., pers. comm., 2005).

Alone, it does not constitute the strategic basis for regulation nor does it determine the strategic goals of regulation – such as acceptable limits of mainstream tourism, intensity of activities, spatial and temporal distribution, and may be what types of activity should be permitted.

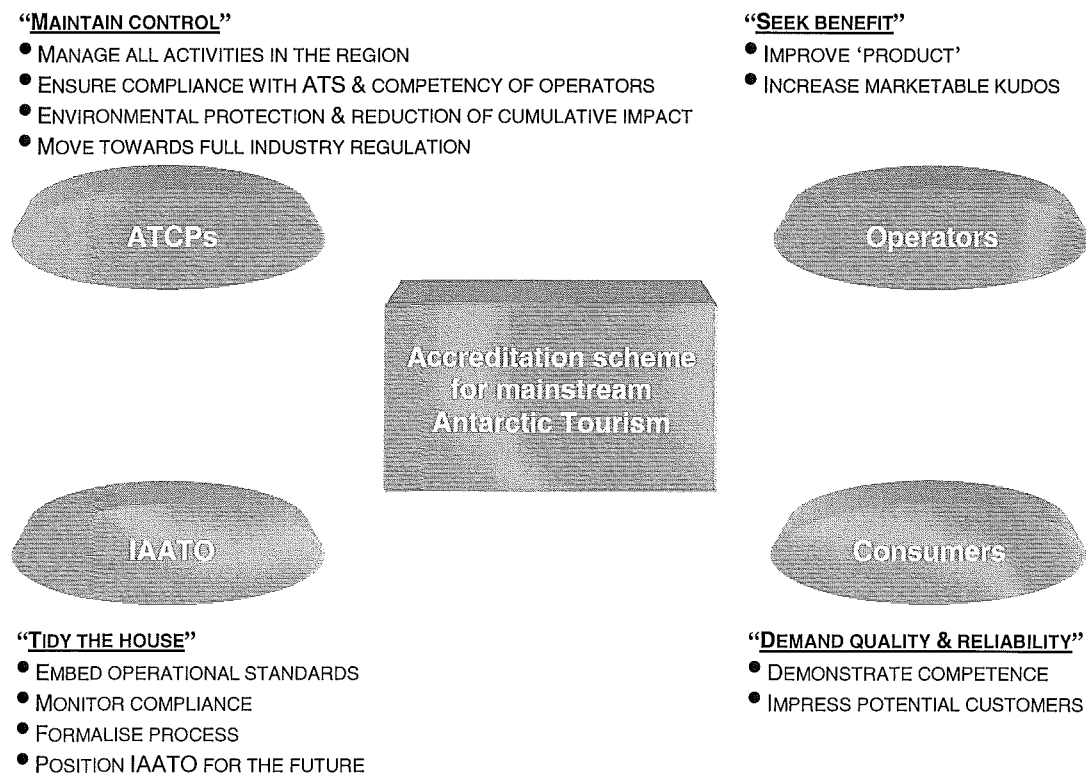
A scheme takes the strategic direction and acts upon it to convert evidence of competence into a measure of attainment of an operator – into a standard that consumers could recognise and use to differentiate between operators.

An accreditation scheme should encourage the adoption of the highest standards for the good of the environment and the wider community.

## DRIVERS FOR ACCREDITATION

Motivations for the implementation of an accreditation scheme are not consistent across stakeholders (see Figure 6). The same goal may be desired for different reasons and therefore the synergy may not be entirely intentional. The diagram below highlights the goals of each stakeholder group

FIGURE 6: ILLUSTRATION DEMONSTRATING THE MANY & VARIED DRIVERS FOR MAINSTREAM TOURISM INDUSTRY ACCREDITATION. SOURCES: HEMMINGS, A., 2004, HUGHES, T., PERS. COMM., 2005, IAATO, 2004, MORTIMER, G., PERS. COMM., 2005, PRIOR, E., PERS. COMM., 2005, SANSON, L., PERS. COMM., 2005, UK ATME DELEGATION, 2004



Unsurprisingly the representative bodies desire greater control, clarity and consistency. Operators and consumers seeking more selfish benefits see accreditation from a different perspective.

## SELECTION OF ACCREDITING ORGANISATION

The selection of the accrediting organisation, responsible for giving formal recognition of an operator's competence to carry out tourism activities in the Antarctic, considers several factors including *inter alia* their;

- Skills, experience and relevant body of knowledge
- Perceived image and credentials
- Degree of independence from the industry &/or organisation being accredited

Advantages and disadvantages (see Table 3) should be carefully balanced.

**TABLE 3: COMPARISON OF THE ADVANTAGES AND DISADVANTAGES OF VARIOUS CANDIDATES FOR THE ROLE OF ACCREDITOR, WITHIN AN ACCREDITATION SCHEME FOR MAINSTREAM TOURISM.**

CANDIDATE	ADVANTAGES	DISADVANTAGES
ATCP	<ul style="list-style-type: none"> <li>• PERCEIVED AS A HIGHER AUTHORITY WITHIN THE ATS</li> </ul>	<ul style="list-style-type: none"> <li>• POLITICAL UNCERTAINTY OVER WHICH ATCP(s) SHOULD ACCREDIT TOURISM OPERATORS, AND IF THEY SHOULD ACCREDIT THEIR OWN OR THOSE OF OTHER NATIONS</li> <li>• POTENTIALLY INFLAMMATORY TO THE ISSUE OF TERRITORIAL SOVEREIGNTY</li> </ul>
SECRETARIAT	<ul style="list-style-type: none"> <li>• A NEUTRAL CANDIDATE</li> </ul>	<ul style="list-style-type: none"> <li>• ONLY QUASI-INDEPENDENT</li> <li>• NEWLY FORMED, UNDER-POWERED AND LACKING EXPERIENCE OF BOTH ACCREDITATION SCHEMES AND OPERATIONS OF ANTARCTIC TOURISM</li> </ul>
IAATO	<ul style="list-style-type: none"> <li>• EXTENSIVE INDUSTRY KNOWLEDGE AND EXPERIENCE OF OPERATING IN THE REGION</li> <li>• ALREADY OPERATING SCHEME TO ASSESS OPERATOR COMPETENCE PRIOR TO FULL MEMBERSHIP</li> </ul>	<ul style="list-style-type: none"> <li>• NOT INDEPENDENT FROM OPERATORS BEING ACCREDITED</li> <li>• ETHICALLY QUESTIONABLE TO GIVE ACCREDITING AUTHORITY TO A BODY ALREADY IN EXISTENCE WITHOUT COMPETITION</li> </ul>
EXTERNAL PARTY	<ul style="list-style-type: none"> <li>• TRULY INDEPENDENT</li> <li>• ACCREDITATION EXPERIENCE</li> </ul>	<ul style="list-style-type: none"> <li>• LITTLE TO NO EXPERIENCE OF ANTARCTICA AND THE MAINSTREAM TOURISM ACTIVITIES OPERATING THEREIN</li> </ul>

Both ATCPs and the Antarctic Treaty Secretariat do not look convincing candidates as potential accreditors for reasons of political acceptability, relevant knowledge and experience.

The corporate knowledgebase of IAATO has been questioned with respect to its familiarity with international accreditation schemes (Hemmings, A., pers. comm., 2005). Their experience of vetting prospective operators to become full members may go some way to alleviating this concern; however, they may be no perfect organisation demonstrating deep expertise in both mainstream Antarctic tourism and international accreditation schemes.

The use of a combination of organisations to accredit operators would inject a further degree of complexity into this process, when there is a consistently stated desire to keep it simple.

#### **RESPONSIBILITIES OF THE ACCREDITOR**

The responsibilities of an accreditor are not absolutely clear and may vary dependent upon the nature of the accreditation scheme and accrediting body selected. Efforts have been made in the past to address this question (Australia ATME Delegation, 2004) and an ICG for Accreditation, formed after ATCM XXVII, is in progress.

An accreditor is likely to be charged with the responsibility for launch and on-going management of the scheme. Specific tasks may include day-to-day administration, accreditor certification and co-ordination of inspections. The accreditor (and/or contracted observers) will monitor infringements of operational standards and procedures, though whether the accreditor will have the policing responsibility of enforcement is not clear.

The accrediting organisation will likely be answerable to the ATCM that will play an overseer role with regard to this regulatory mechanism.

## ROLE AND RESPONSIBILITIES OF AN OVERSEER

Statements made by representatives of ATCPs with respect to the management and regulation of tourism clearly indicate the expectation of a central role for the ATCPs or the ATCM.

“While [an accreditor] has a role to play in maintaining standards... New Zealand believes that it is the primary responsibility of the Antarctic Treaty Consultative Parties to establish the regulatory basis for the tourism industry in Antarctica, as they do for the management of all human activities there” (Hughes, T., pers. comm., 2005)

This has been acknowledged by *inter alia*, representatives of IAATO and ASOC. Furthermore, suggestions have been made (in personal communications with stakeholders) that the ATCM should reserve the right to audit the accreditor periodically, reporting back to ATCPs who may wish to be satisfied as to the effectiveness of the scheme in meeting its key objective of environmental protection.

It is widely assumed that the existing framework for observation and inspection (adopted under the 1959 Antarctic Treaty) will serve as a basis for auditing. There is however, no specific inspection list for tourism (ASOC, 2004e) and one may have to be developed.

### **In summary:**

- The objective of accreditation is to ensure greater environmental protection, minimising cumulative impact as the result of tourism
- Alone, an accreditation scheme does not constitute the strategic basis of regulation
- It is a tool measuring operator competence against ATCM-defined standards and operating procedures
- It can be used to encourage cooperation around the coordination of site visits by adopting consistent operating procedures
- An accreditor will be selected on the basis of their knowledge of the tourism industry and accreditation, as well as their degree of independence
- The ATCM will have the role of ultimate regulator, actively auditing the accreditation scheme

## ***MECHANISTIC COMPONENTS***

In this section, the paper examines how strategic concepts may manifest themselves operationally, as processes, standards and a system of measurement and monitoring for compliance.

## **THE REALITY OF ACCREDITATION**

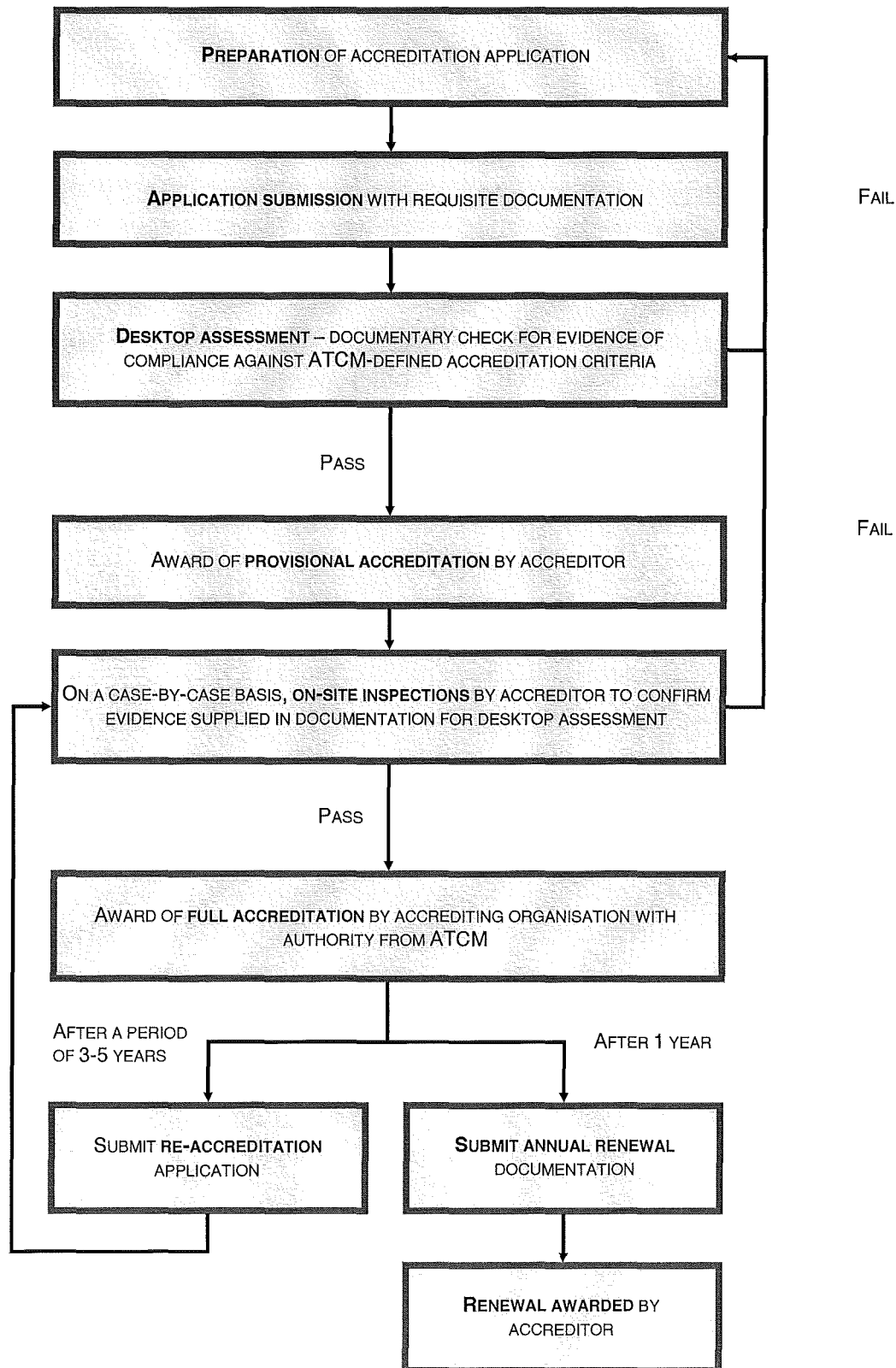
Accreditation is a process, managed and operated by the accreditor and involving the operator at key points. The process (see Figure 7) makes reference to various principles, operational standards and guidelines to which the operators must conform. The Association is presently compiling the “IAATO Handbook Defining Operational Standards and Accreditation and Audit Procedures for Membership” (IAATO, 2004a). This sets out *inter alia*:

- Objectives and the Antarctic Treaty System
- By-laws
- Accreditation and compliance
- Operating procedures and standards
- Emergency procedures
- Reporting
- Cumulative impacts
- Relevant legislation
- EIA processes
- IAATO history
- Member directory and executive
- List of reference documents

An operator wishing to be accredited must confirm their compliance to these standards and operating procedures as part of their application. This is then submitted to the accreditor (assumed to be IAATO in this case) whereby the documents are scrutinised against ATCM-defined accreditation criteria. Provisional accreditation is awarded if all criteria are met. On-site inspections are made by representatives of the accreditor to confirm the documentary evidence supplied previously. On passing this inspection, the operator is certified by the accreditor. Annual renewal and 3-5 yearly re-accreditation are outlined in the process (see Figure 7), as well as the expected course of action upon failure of any assessment.

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**FIGURE 7: HIGH-LEVEL OVERVIEW OF THE PROCESS OF ACCREDITATION, INCLUDING ANNUAL RENEWAL AND RE-ACCREDITATION.** SOURCES: AUSTRALIA ATCM DELEGATION, 2004A, IAATO, 2004B.



## **MANDATORY VS. VOLUNTARY SYSTEMS**

Views are mixed amongst stakeholders as to whether the accreditation scheme should be mandatory or voluntary. Those stakeholders that agree can do so for different reasons.

Lou Sanson, CEO of Antarctica New Zealand is a proponent of a voluntary scheme – at least in the beginning – “to get it going”. This is a pragmatic view to the implementation of the first round of tourism governance.

His preference for a voluntary scheme is shared by ASOC who suggest a mandatory scheme is unhelpful. The NGO claims a mandatory approach loads an accreditation scheme with characteristics not normally associated with accreditation schemes and almost dooms it to failure. At the very least it pushes the timeline out to the right to such an extent it’s probably doomed to failure (Hemmings, A., pers. comm., 2005).

The voluntary approach is seen as more achievable in terms of implementation, perhaps within two years (Mortimer, G., 2005, Hemmings, A., 2005), though what the precise nature of the scheme would be is debatable.

Others believe that a mandatory scheme is the only way for accreditation to be effective and credible, suggesting the requirement for additional legislation as a basis for mandate (Hughes, T., pers. comm., 2005, Wratt, G., pers. comm., 2005).

However, the route to implementing a mandatory system, enforced by domestic legislation of ATCP states, is fraught with obstacles and delay. For this reason, Hemmings speculates that most ATCPs will opt for the voluntary approach “unless [the ICG on Accreditation] can demonstrate significant advantage of a mandatory system to persuade states it is worth the cost and effort to push potentially thorny legislation through” (Hemmings, A., 2005).

If a voluntary system were selected there would need to be real incentives for operators, especially those not previously members of IAATO, to tempt them into the scheme.

Scenarios may provide a suitable basis for evaluation of mandatory and voluntary systems of accreditation in the context of Antarctic tourism.



## ACCREDITATION SCHEME SCENARIOS

Four scenarios (in a total of six variants) have been identified for potential implementation of an accreditation scheme. Each option has been evaluated against a number of criteria:

*Compulsion* – is the scheme mandatory or voluntary? There are arguments for both. The norm for accreditation schemes elsewhere in the world is voluntary involvement whereby target bodies have a choice. A mandatory scheme would place a greater degree of control within the hands of the ATCM. This may influence the effectiveness of governance, as greater control over the actions of operators is provided by a legally compelling mandate.

*Neutrality* – is the scheme operated by a truly independent body, a quasi-independent body (i.e. connected to the ATS, but not to the tourism industry) or by a previously installed self-regulator (i.e. IAATO)? This will influence the perception of 'bias' and therefore the effectiveness of any governance regime as perceived by the operators and other external, interested parties.

*Coverage* – is the scheme open to all operators, regardless of membership status with the incumbent industry association? It is widely perceived that regulatory efforts should not be limited to members of a pre-existing body.

*Competency* – is the scheme operated by a body or individuals with extensive experience of Antarctica, of tourism and of the nuances of running successful international accreditation schemes? This may impact on the ease of implementation (and on-going operation) of any scheme.

*Benefits* – as a result of the combination of criteria, does the scenario have specific strengths or advantages? Some benefits will be of greater interest to particular stakeholders and may be of more value than others, influencing both a scenario's effectiveness and ease of implementation.

*Pitfalls* – are there any significant disadvantages? These may be actual or perceived, though both may be equally negative.

In reality, there may not be a 'best' option, more likely, a 'least worst' option. Trade-offs will no doubt be made against specific criteria, benefits and pitfalls (see Table 4) to achieve a common understanding and agreement.

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**TABLE 4: EVALUATION OF ACCREDITATION SCENARIOS AGAINST KEY CRITERIA**

SCENARIO	COMPULSION	NEUTRALITY	COVERAGE	COMPETENCY	BENEFITS (STRENGTHS)	PITFALLS (WEAKNESSES)
INFORMAL IAATO-ONLY	VOLUNTARY	SELF- REGULATED (IAATO)	RESTRICTED (IAATO-ONLY)	HIGH	<ul style="list-style-type: none"> <li>• FORMALISATION OF IAATO PROCESSES</li> <li>• STRONG KNOWLEDGEBASE</li> </ul>	<ul style="list-style-type: none"> <li>• NO GREATER COVERAGE</li> <li>• NO MORE COMPULSION TO ACT</li> <li>• STILL PERCEIVED AS BIASED 'REGULATOR'</li> </ul>
INFORMAL ALL- OPERATOR	VOLUNTARY	EXTERNAL REGULATION (3 <sup>RD</sup> PARTY)	UNLIMITED (ALL OPERATOR)	LOW	<ul style="list-style-type: none"> <li>• CREDIBLE AS INDEPENDENT ACCREDITOR</li> <li>• GREATER COVERAGE</li> <li>• CONSISTENT WITH OTHER SCHEMES</li> </ul>	<ul style="list-style-type: none"> <li>• WEAK KNOWLEDGEBASE</li> <li>• CONFLICT / CONFUSION WITH IAATO ROLE</li> <li>• LITTLE ADDED BENEFIT</li> </ul>
	VOLUNTARY	SELF- REGULATED (IAATO)	UNLIMITED (ALL OPERATOR)	HIGH	<ul style="list-style-type: none"> <li>• GREATER COVERAGE</li> <li>• CONSISTENT WITH OTHER SCHEMES</li> <li>• STRONG KNOWLEDGEBASE</li> </ul>	<ul style="list-style-type: none"> <li>• STATUS QUO</li> <li>• SAME DRIVERS FOR ACCREDITATION AS JOINING IAATO PREVIOUSLY</li> </ul>
ENDORSED ALL- OPERATOR	VOLUNTARY	EXTERNAL REGULATION (3 <sup>RD</sup> PARTY)	UNLIMITED (ALL OPERATOR)	LOW	<ul style="list-style-type: none"> <li>• ENDORSEMENT INCREASES CREDIBILITY</li> <li>• CREDIBLE AS INDEPENDENT ACCREDITOR</li> <li>• GREATER COVERAGE</li> <li>• CONSISTENT WITH OTHER SCHEMES</li> </ul>	<ul style="list-style-type: none"> <li>• ENDORSEMENT NOT EQUAL TO MANDATE</li> <li>• WEAK KNOWLEDGEBASE</li> </ul>
	VOLUNTARY	SELF- REGULATED (IAATO)	UNLIMITED (ALL OPERATOR)	HIGH	<ul style="list-style-type: none"> <li>• ENDORSEMENT INCREASES CREDIBILITY</li> <li>• LESSER PERCEPTION OF BIAS</li> <li>• GREATER COVERAGE</li> <li>• GREATER KUDOS / DESIRABILITY</li> <li>• CONSISTENT WITH OTHER SCHEMES</li> </ul>	<ul style="list-style-type: none"> <li>• ENDORSEMENT NOT EQUAL TO MANDATE</li> </ul>
MANDATORY ALL- OPERATOR	MANDATORY	SELF- REGULATED (IAATO)	UNLIMITED (ALL OPERATOR)	HIGH	<ul style="list-style-type: none"> <li>• CAPTURE ALL OPERATORS</li> <li>• ATCM CONTROL OVER ANTARCTIC TOURISM ACTIVITIES</li> </ul>	<ul style="list-style-type: none"> <li>• INCONSISTENT WITH OTHER SCHEMES</li> <li>• HIGHER RISK &amp; EFFORT TO IMPLEMENT</li> <li>• INEFFECTIVE FOR NON-AT OPERATORS</li> </ul>

### Verdict

A verdict for each scenario, based upon its qualitative assessment against key criteria, is outlined below. Relative positioning of scenarios, in terms of the ease of implementation and effectiveness of the scheme as a tool for the governance of the mainstream tourism industry, is illustrated in Figure 8.

#### ***Scenario: Informal IAATO-only***

Restricting an accreditation scheme to an already well-organised membership group appears to deliver little real benefit to the wider industry, beyond a tidy-up exercise within the industry association. It is questionable as to what this option will actually contribute (in addition to what currently exists) to the resolution of the key issue of minimising cumulative impact.

*Verdict: Little value beyond internal IAATO house-keeping*

#### ***Scenario: Informal All-operator (externally accredited variant)***

An externally regulated scheme open to all operators would be consistent with other accreditation schemes around the world. Accreditor independence may increase the credibility of the scheme in the eyes of non-members; however, its effectiveness and ease of implementation would no doubt be reduced by the lack of Antarctic knowledge, skills and experience. Issues with overlap and confusion between the role of IAATO and the accreditor may lessen the appeal of this option.

*Verdict: Trade-offs for increased credibility may not pay off*

#### ***Scenario: Informal All-operator (IAATO accredited variant)***

Were IAATO to manage a voluntary, all-operator scheme it could be considered as merely an IAATO version 2 – operators have no more compelling reason to join the accreditation scheme than they did to join IAATO. The Association strives to include non-members as a matter of course and this would be no different from an IAATO initiative.

*Verdict: Status quo – no significant additional benefit for operators*

***Scenario: Endorsed All-operator (externally accredited variant)***

This scheme represents a useful combination of a credible accreditor backed by strong sponsorship from the highest recognised decision-making forum in the region. The scheme may be of greater interest to non-IAATO operators, but has an operational weakness in its lack of regional knowledge and expertise, and lack of mandate – all standards remaining hortatory.

*Verdict: Greater credibility & operator desirability but operationally weak and inexperienced.*

***Scenario: Endorsed All-operator (IAATO accredited variant)***

Overt endorsement of this scheme from the ATCM may increase the credibility of a scheme run by an industry membership-body. It gives a clear signal to non-IAATO operators of an intended future direction and perhaps, an air of inevitability that may lessen bias toward IAATO, given the higher level approval. IAATO's rich body of knowledge positions it well to run the scheme.

*Verdict: Easier to implement than full mandate and managed by an organisation with vast Antarctic experience. Endorsement by the ATCM may tip the scales on any perceived industry bias, though this may warrant further investigated.*

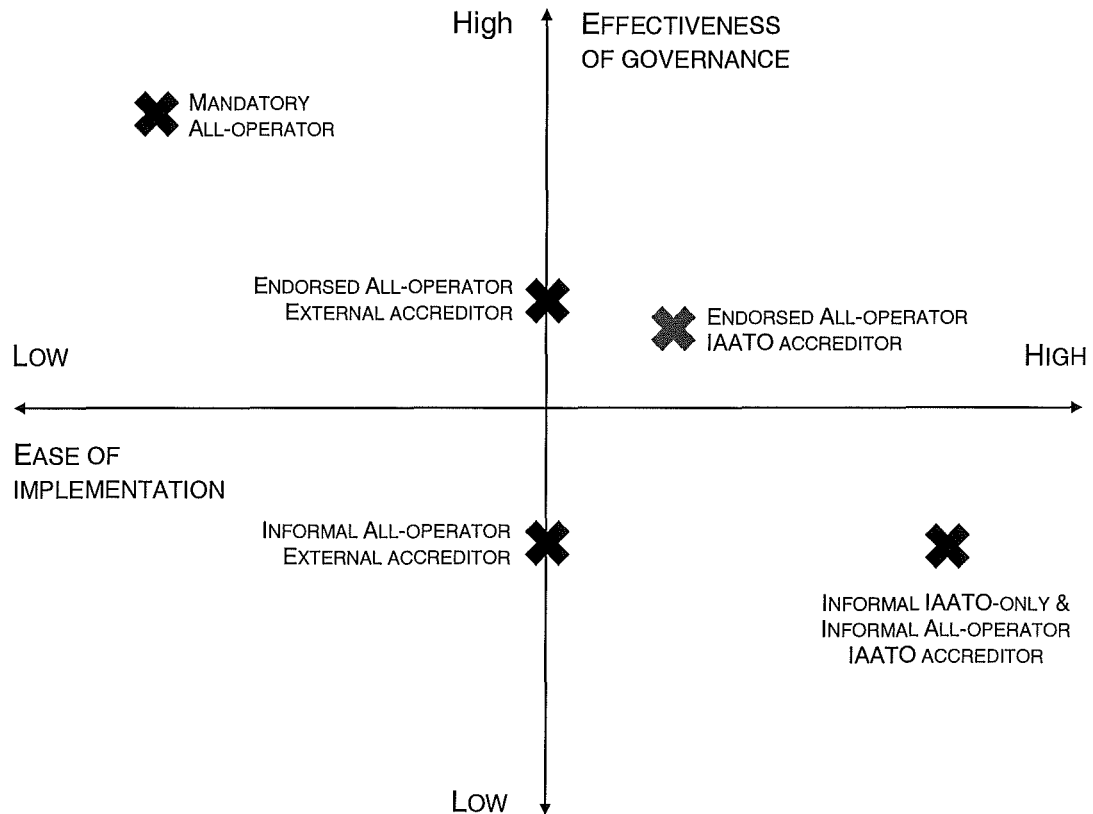
***Scenario: Mandatory All-operator***

More complex and problematical for the ATCPs, the mandatory scheme still fails to encompass operators from non-ATCP states. This is probably not solvable in the short-term, however, it is open to all operators regardless, and would require voluntary co-operation from operators outside ATCP states.

IAATO would be well positioned to run the scheme, under the auspices of the ATCM, providing a strong knowledgebase. Any weakness in the nuances of formal accreditation schemes could be temporarily supported and any bias regarding the position of IAATO would be nullified by the mandate.

*Verdict: Best option in terms of effectiveness, but probably unachievable in a short time-frame given the legal complexity and effort to enact domestic legislation in all ATCP states. Perhaps, pursuit of this scenario may be operated in parallel as the longer-term option.*

**FIGURE 8: ILLUSTRATION OF THE RELATIVE POSITIONING OF ACCREDITATION SCHEME SCENARIOS AGAINST TWO MAJOR CONSIDERATIONS – THEIR EASE OF IMPLEMENTATION AND THE EFFECTIVENESS OF GOVERNANCE RESULTING FROM THEIR IMPLEMENTATION. THE UPPER RIGHT QUADRANT REPRESENTS THE IDEAL OUTCOME.**



*Ease of implementation* considers time, complex implementation scenarios, lack of political acceptance and the accreditor's ability to manage the implementation and/or on-going operation.

*Effectiveness of governance* takes into account *inter alia*, the presence of supportive legislation, compelling reasons to act (such as incentives) and the breadth of coverage of each scheme.

Figure 8 illustrates the trade-off some scenarios make between ease of implementation and effectiveness of the final outcome. The mandatory scheme (top left), may be the most effective in controlling the industry, but is perhaps least likely to be implemented due to the problematical nature of legislative change.

In contrast, the easier, quick-fix options seem to add little value in terms of their effectiveness so it's questionable as to why they should be considered either.

Only the Endorsed All-operator IAATO accredited scheme is positioned in the 'ideal' upper left quadrant. ATCM endorsement provides an additional measure of credibility to this option, managed by IAATO who almost hold a monopoly on the necessary skills.

Early reactions from stakeholders to an Endorsed All-operator scenario, managed by IAATO have been cautiously positive. It appears plausible, with the caveat that the ATS is recognised as & operates as the ultimate overseer.

### **CANDIDATES FOR ACCREDITATION**

Given the mainstream tourist industry scope of this paper, candidates for accreditation can be categorised as either IAATO-members or non-IAATO operators.

For an accreditation scheme to be of most value to the ATCM in regulating cumulative impact of the whole industry, the audience should be as wide as possible.

Notwithstanding the scope of this paper, some stakeholders have considered yacht owners as potential candidates for accreditation, though it is difficult to see how this might be achieved. There is no reliable or widespread system to identify yacht owners intending to voyage to the Antarctic, despite the fact that some stakeholders believe that private yacht expeditions may be responsible for an even greater cumulative impact in the region than mainstream tourism (even in the face of their obvious difference in scale).

Adventure tourism may also be difficult to regulate effectively through an accreditation scheme as many 'extreme' expeditions are one-off events, however, they may use an accredited mainstream operator for transport, guiding, accommodation and search and rescue (SAR) back-up (Murray & Jabore, 2004). Most concern regarding 'extreme' adventure tourism surrounds their SAR arrangements and contingency planning (Australia ATME Delegation, 2004b) and in volume terms, they represent a tiny proportion of total traffic in the region. Provided they have completed an EIA and satisfied *inter alia* SAR criteria they are usually free to continue (Sanson, L., pers. comm., 2005).

### **CRITERIA, METRICS AND MONITORING**

Candidates following the accreditation process (outlined in Figure 7) provide evidence of their competence against a number of ATCM-defined or agreed criteria that assess their ability to operate safely and effectively in the region. Each criterion is likely to have a pass / fail value (as simple as yes / no) that is checked by the accreditor in conjunction with supplementary documentation.

Metrics are monitored on-site through inspections, by representatives of the accreditor to confirm claims made for provisional accreditation. ATCP observers may perform this role alongside inspectors from the accreditor, over and above performing regular spot-checks as and when the need arises.

Further monitoring may be undertaken by the ATCM to audit the operation of the accreditor against a set of pre-determined performance metrics.

### **PERIODICITY OF ACCREDITATION**

Accreditation is not a one-off event, but an ongoing process whereby operators are certified by the accreditor following an initial application and inspection, and then subject to annual renewals and a requirement for re-accreditation after a period of between 3-5 years (as shown in Figure 7).

Interaction between an operator and the accreditor is not limited to the points outlined above. Specific events may trigger re-evaluations of an operator's accreditation status (whether in part or entirety). These events and the scope of re-evaluation are described below in Table 5:

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**TABLE 5: TRIGGERS FOR RE-EVALUATION OF AN OPERATOR'S ACCREDITATION STATUS AND THE SCOPE OF THE RE-EVALUATION.** SOURCE: HEMMINGS, A., PERS. COMM., 2005, MORTIMER, G., PERS. COMM., 2005, WRATT, G., PERS. COMM., 2005.

EVENT OR TRIGGER	SCOPE OF RE-EVALUATION
CHANGE OF OPERATOR OWNERSHIP	COMPLETE RE-ACCREDITATION
CHANGE OF <i>MODUS OPERANDI</i>	COMPLETE RE-ACCREDITATION
CHANGE OF VESSEL	RELEVANT COMPONENTS ONLY
SIGNIFICANT GROWTH OF OPERATION	RELEVANT COMPONENTS ONLY
CHANGE OF OPERATING AREA	ORIGINAL ACCREDITATION SHOULD BE RELEVANT TO ALL AREAS OF ANTARCTICA

It would appear overly bureaucratic were there a requirement to complete re-certify in every instance. Annual renewal is expected to be a much more simple and rapid task to complete for operators and accreditation inspectors and would likely constitute paperwork only.



## **LIMITATIONS OF AN ACCREDITATION SCHEME**

Working from the suggested scope of an accreditation scheme (described on p.10-11), limitations and uncertainties are described here in more detail:

### *Enforcement of penalties for non-compliance*

An accreditor is responsible for assessing and evaluating an operator's abilities so as to judge their competence to undertake mainstream tourism activities in the Antarctic. Where there are breaches of the accreditation criteria or deliberate avoidance of fee payment (Australia ATCM Delegation, 2004), systems and penalties for infringements should apply.

It is not clear as to whether the accreditor is responsible for the enforcement of penalties for behaviour or operation outside the agreed parameters. Whether this is of great importance in a voluntary system is debatable. Presently, IAATO actively monitors its members using a threat of revoked membership in the absence of a legal mandate.

### *Setting of limits or caps*

An accreditation scheme is not intended to set limits – though it may seek evidence of compliance to specific thresholds, outlined in operational standards to which operators must adhere.

### *Accreditation of other tourism and non-governmental operators*

Any limitations in the audience of the accreditation scheme may reflect upon its success. This may have to be balanced with the practicalities of launching a scheme and seeking to increase the audience as it is more firmly established in the day-to-day operations of Antarctic tourism.

The accreditation scheme, in its first instance may not apply to small-scale tourism (using smaller vessels, typically yachts to travel to the region) and adventure tourism activities. These may be target areas for expansion in future. Moreover, the task of regulating other non-governmental activities, such as NGO expeditions should be examined to determine the applicability of an accreditation scheme designed to minimise the cumulative impacts caused by tourism activities.

## **ADMINISTRATIVE ISSUES**

Some detailed administrative issues need to be addressed as they have specific implications for the scheme. For instance, administration costs of the scheme should be assessed and defined in order to determine the tariffs to be levied upon operators for cost-recovery purposes only. Cost may be a key driver influencing operator decision-making when considering whether or not to apply for accreditation.

### *Administrative load & man-power*

Points for further consideration include the design of any working assets, such as checklists, forms, manuals, administrative templates and systems for data capture, storage and retrieval (e.g. databases vs. hard-copy). The administrative load has not yet been debated fully, nor the manpower needed to support the accreditation scheme.

Initial estimates indicate a low-level of support is required, which is likely to be received well by the operators who will eventually foot the cost of accreditation.

- |                                 |                                    |
|---------------------------------|------------------------------------|
| • Accreditation Board           | 3-4 people part-time               |
| • Desktop Certification Officer | ½ - 1 person full-time             |
| • Accreditation Inspectors      | Equiv. man-hrs, 1 pax. over 6 mths |

(An initial start-up period may incur additional loading).

The costs for these resources and associated expenses incurred (such as inspector travel and subsistence, facilities fees for the offices of the accreditor and other capital set-up costs) are likely to be factored into accreditation and renewal fees, paid for by the operators. Australia proposed a fee-for-service basis at ATCM XXVII.

### *Accreditor location*

The physical location of the accreditor is likely to be determined by the selection of an accrediting organisation. For example, if IAATO were to be sub-contracted by the ATCM to manage the scheme, it would be based at IAATO's head-office in the United States.

**In summary:**

- The accreditation process, utilises various principles, operational standards & guidelines against which operator competence is measured and monitored
- The process includes testing 'gates' where operators can be passed or failed
- Opinions are mixed over the adoption of mandatory or voluntary systems – both have advantages and disadvantages
- Accreditation should be open to all operators, regardless of origin and membership of existing associations or bodies
- Re-accreditation is required after 3-5 years or triggered after a specific event (such as change of *modus operandi*)
- A total of six scenarios and variants have been scrutinised against factors including *inter alia* compulsion, coverage, accreditor competence & neutrality

## DISCUSSION

The issue of accreditation (within the context of mainstream tourism industry regulation) attracts a wide diversity of stakeholder perspectives. There is no single, obvious solution that will reduce cumulative impact resulting from tourism activities. Benefits accrued by stakeholders as the result of an accreditation also differ (see Table 6).

**TABLE 6: BENEFITS ACCRUED THROUGH THE IMPLEMENTATION OF AN ACCREDITATION SCHEME FOR MAINSTREAM TOURISM.** SOURCES: ASOC, 2004E, AUSTRALIA ATCM DELEGATION, 2004.

STAKEHOLDER	PROPOSED BENEFITS
TOURISTS	<ul style="list-style-type: none"><li>• ENHANCED INDUSTRY REPUTATION &amp; GREATER CUSTOMER CONFIDENCE TO DISCRIMINATE BETWEEN OPERATORS</li></ul>
OPERATORS	<ul style="list-style-type: none"><li>• CACHE OF DISTINCTION</li><li>• COMMERCIAL ADVANTAGE OF LONG-TERM CERTAINTY</li><li>• IMPROVED ABILITY TO ATTRACT AND RETAIN EMPLOYEES</li><li>• POTENTIAL FOR REDUCED INSURANCE COSTS</li></ul>
REGULATORS	<ul style="list-style-type: none"><li>• GREATER ENVIRONMENTAL PROTECTION THROUGH THE APPLICATION OF CONSISTENT OPERATING PROCEDURES AND STANDARDS</li><li>• GREATER DEGREE OF MANAGEMENT CONTROL OVER INDUSTRIES OPERATING IN THE ANTARCTIC</li></ul>
INTERESTED PARTIES (E.G. NGOS)	<ul style="list-style-type: none"><li>• PROCESS BY WHICH CONCERNS CAN BE RAISED AND INCORPORATED INTO TOURISM GOVERNANCE</li></ul>

Whatever the eventual outcome, there is a keenness to avoid needless bureaucratic process, something both IAATO and operators fear (Mortimer, G., pers. comm., 2005, Prior, E., pers. comm., 2005, Wratt, G., pers. comm., 2005). Whether an accreditation scheme represents a 'simple' solution that addresses the key issues presently facing tourism will be discussed here.

A number of alternative scenarios for accreditation have been evaluated in this paper, scrutinising the benefits, pitfalls, and various other fundamental characteristics of each option. Decision-makers are faced with the task of debating the chosen option.

## **STRATEGIES FOR DECISION-MAKERS**

No matter what scenarios are presented decision-makers can pursue three different strategies. Which of the strategies they choose (outlined below) is likely to be dictated by value-systems, pragmatism and circumstance.

- **Path of Least Resistance** – describes selection of the option that is easiest to implement, though likely to deliver a relatively ineffective governance regime. This may be considered a ‘fudge’ and will not likely address the crux of the issue with any great degree of success in the long-term.
- **‘Least Worst’ Option** – represents a compromise whereby decision-makers attempt to select an option that balances the desire for simple system deployment with the necessity of achieving as effective a system as possible to minimise cumulative impact. Determining exactly what constitutes a balanced outcome is a matter for negotiation between stakeholders.
- **Optimal Scenario** – outlines ‘the ideal’ and perhaps, the most difficult option upon which to gain consensus. Stakeholders have no shared view of the fundamental principles by which an accreditation scheme should operate (e.g. mandatory vs. voluntary) and each decision-maker may have a different optimal scenario.

To keep debate focused, it is important to return to the needs and issues facing the industry and ask what accreditation (and the need for regulatory frameworks more broadly) may do to address these issues. Top of mind is the need for greater environmental protection, by minimisation of cumulative impact caused by tourism activities. In consequence, there is a need for greater co-ordination amongst all tour operators and perhaps a need for greater legislative authority with respect to management of tourism.

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Additionally, some guiding principles, may aid discussion. These principles articulate the desire for:

- Broad involvement of operators to act together to reduce cumulative impact at sensitive sites
- Best utilisation of skills, knowledge and expertise available to implement and manage an effective accreditation scheme
- Regulatory independence from tourist activities to ensure operator competency is fairly assessed
- Sensible levels of cost, work load and complexity to be the aim of any industry deployment

## **SHORT-LISTED ACCREDITATION SCENARIOS**

Following evaluation of accreditation scheme scenarios (p.41-46), the initial verdicts highlight two key options for further consideration and discussion.

- Mandatory All-Operator scheme
- Voluntary (or informal) Endorsed scheme

### **SCENARIO1: THE MANDATORY SCHEME**

A mandatory scheme obligates the involvement of all operators. Competence can be scrutinised across the mainstream Antarctic tourism industry and a consistently high awareness of cumulative impact can be achieved.

All operators are compelled to co-operate in the co-ordination of tourism vessels and their scheduled visits to sites in the region. Therefore, minimisation of cumulative impact can be managed more holistically, covering by far the largest majority of non-governmental activity. This discussion, does however exclude NAP activities, non-mainstream tourism expeditions including small sailing vessels (c.12 passengers), adventure tourists and other non-governmental activity, such as NGO expeditions (Hemmings, A., pers. comm., 2005, Sanson, L., pers. comm., 2005). Of these activities, it is extremely debatable whether information could be provided – certainly not in the level of detail available to IAATO.

The presence of a mandate, infers solid legislative grounding of the accreditation scheme, though it is not yet certain how this might be achieved. ASOC identified three potential legal mechanisms; a new ATS instrument, a new Antarctic Treaty Measure and a new Protocol Annex (ASOC, 2004c). All require enactment under domestic legislation of ATCPs and notwithstanding all other factors; this alone may cause considerable delays to the deployment of the scheme in this scenario.

Attitudes to the requirement for specific legislation to mandate an accreditation scheme are mixed. Some question the need for additional legislation suggesting that it over complicates matters, when “...there has been no indication of aberrant behaviour or malevolence within Antarctic tourism that hints at that sort of need...” (Mortimer G., pers. comm., 2005). ASOC have also suggested that mandating an accreditation scheme is counter to other instances world-wide (Hemmings, A., pers. comm., 2005).

Others are more firmly of the opinion that additional legal measures are preferable to mandate the scheme (Australian ATCM Delegation, 2004, Hughes, T., pers. comm., 2005, Wratt, G., pers. comm., 2005).

Some lean towards a voluntary unlegislated system first, before formalising its legal basis. Perhaps for reasons of practicality, this is the best way to “get it going” (Sanson, L., pers. comm., 2005).

IAATO's position as accreditor represents a 'least worst' decision – a trade-off between the importance of knowledge and experience required to set-up and run the scheme, and the desire for independence. The presence of a mandate effectively negates operator reticence to join due to ill-perceptions of the Association. The intention of the ATCM to actively audit the accreditor should persuade pro-independence stakeholders that IAATO can run the scheme effectively. That this is not voluntary or limited to IAATO-members sends a strong message of the ATCM's intent to manage tourism activities in the Antarctic.

## **SCENARIO 2: THE VOLUNTARY ATCM-ENDORSED SCHEME**

An informal scheme cannot obligate any operator to participate, however, the presence of a powerful endorsement from the ATCM, presents a united front to the operators and perhaps a strong indication of future direction. For this reason, this scheme may be of more interest to non-IAATO operators and more broadly appealing than an IAATO-only scheme, that lacks the kudos of a scheme sponsored by the highest decision-making forum in Antarctica.

Though no formal mandate can ensure co-operation of parties involved in co-ordination of vessel scheduling, the existence of a direct link to the ATCM, though their role as overall regulator, may act as a persuasive device. In this way a more positive approach to minimising cumulative impact may be possible.

Absence of a mandate (at least at the start), makes the Endorsement Scenario a quicker, more streamlined option to set up. It may also limit the bureaucratic load feared by most operators.

IAATO's involvement as the accreditor is a competence-based decision. It is difficult to see what other organisation has the expertise and competence.



## **SCENARIO COMPARISON**

The key difference between the two scenarios is the existence of mandate. However, the endorsed scheme could perceivably evolve into a mandated scheme. Both are administered by IAATO, widely acknowledged to hold the most relevant body of knowledge to manage such a scheme, and both target the full breadth of mainstream operators.

Should the perceived bias of the accreditor remain an issue, an Accreditation Board may be comprised of a number of parties, including representatives of IAATO, the ATCM and perhaps a representative of a completely independent body (such as the World Wildlife Foundation – facilitator of the guidelines for Arctic Tourism). This enables the majority of the work to be undertaken by experienced and knowledgeable inspectors, but with independent oversight.

Undoubtedly, a mandated scheme would address the issues (p.16-19) more effectively; however its implementation is fraught with difficulty and thus may be perceived as more of an Optimal Scenario and something to work toward over time.

The endorsed scheme may be more realistic, balancing the achievability of implementation (much easier) with the likely effectiveness of the output and could be considered a Least Worst Option.

The table below illustrates how each scenario compares, highlighting the strengths, weaknesses and conflicts associated with either option.

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**TABLE 7: A COMPARISON OF THE SHORT-LISTED ACCREDITATION SCENARIOS AGAINST KEY FACTORS OF EASE OF IMPLEMENTATION AND EFFECTIVENESS OF GOVERNANCE.**

	MANDATED SCHEME	ENDORSED SCHEME
<b>EASE OF IMPLEMENTATION</b>		
ESTIMATED TIMESCALE TO LAUNCH	EST. 5+ YEARS	EST. 2 YEARS
COMPLEXITY	NEGOTIATION OF LEGAL MEASURES WITHIN THE ATS & SUBSEQUENT ENACTMENT OF DOMESTIC LEGISLATION IN MULTIPLE ATCPs	NEGOTIATION FOR ATCM ENDORSEMENT – PROBABLY NOT TACKLED PREVIOUSLY – OTHERWISE FEW DEPENDENCIES
POLITICAL ACCEPTANCE	GREATER NEGOTIATION REQUIRED IN THE FACE OF POLARISED VIEWS. SOME STATES MAY QUESTION NEED FOR A MANDATE & BE NERVOUS OF THE CHALLENGE OF ENACTMENT THROUGH THEIR OWN LEGISLATION	A VOLUNTARY SCHEME MAY BE LESS CONTENTIOUS, THOUGH THE BIAS OF THE ACCREDITOR MAY BE QUESTIONED, DESPITE HIGHER SPONSORSHIP FROM THE ATCM
ACCREDITOR'S ABILITY TO IMPLEMENT	SIGNIFICANT DEPENDENCIES UPON THE ATCPs AND STATE LEGAL SYSTEMS	HIGH DEGREE OF CONFIDENCE
<b>EFFECTIVENESS OF GOVERNANCE</b>		
PRESENCE OF LEGISLATION	SUPPORT OF DOMESTIC LEGISLATION TO ENFORCE MANDATES UPON OPERATORS FROM ATCP STATES	NONE – THIS SCHEME IS NOT MANDATED BUT 'STRONGLY SUPPORTED'. OPT-OUT REMAINS A POSSIBILITY FOR OPERATORS
INCENTIVES	N/A – SCHEME IS OBLIGATORY	TIGHTER LINK BETWEEN TOURISM AND ATCM THAN BEFORE DESPITE NOT BEING LEGALLY BINDING AND GREATER KUDOS FOR OPERATORS TO BE ACCREDITED BY AN ATCM-ENDORSED SCHEME
BREADTH OF COVERAGE	THE SCHEME IS OPEN TO ALL MAINSTREAM TOURISM OPERATORS – THOUGH OPERATORS FROM NON-ATCP STATES ARE NOT FORCED TO PARTICIPATE	OPEN TO ALL MAINSTREAM TOURISM OPERATORS, REGARDLESS OF ORIGIN

## ***FUTURE CHALLENGES***

The strategic and mechanistic components of accreditation discussed in this paper do not represent the sum-total of debate required to launch a scheme and operate the scheme. The following areas represent challenges that should be addressed to fill gaps in thinking to date:

### **PARTICIPATION OF OPERATORS FROM NON-ATCP STATES**

Whilst both mandatory and voluntary schemes are open to all operators, neither has the authority to obligate tourism operators registered in non-Treaty Party countries to participate. If cumulative impact of tourism activity is to be effectively minimised at vulnerable sites in the Antarctic, all operators should be co-operating in the co-ordination of vessel scheduling.

It is difficult to see how this might be achieved when the nation states of these operators do not even officially recognise the Antarctic Treaty System.

### **INVOLVEMENT OF SHIP OWNERS**

Discussion has centred on mainstream tourism operators, responsible for managing passenger expeditions to the Antarctic. Little thought has been given to the ship owners, contracted by operators to provide sea and/or air transport within the region. Ship owners are bound by other international obligations, such as the International Convention for the Prevention of Pollution from Ships (MARPOL) and the International Convention for the Safety of Life at Sea (SOLAS), but the vast majority are not currently members of IAATO or within the proposed scope of an accreditation scheme.

The relationship, roles and responsibilities between tourism operators and ship owners differ from ship to ship. The capacity for ship owners familiar with Antarctic waters to unintentionally cause cumulative impact at Antarctic sites is huge, though not highly probable due to their experience of operating in these regions. As new ships arrive in the region as a result of an expanding market, it introduces less familiar ship owners who may be more likely to make errors of judgement, the corollary of which could be environmentally catastrophic.

This area deserves further investigation to determine the benefit and feasibility of including ship owners within a broader accreditation scheme.

## **CLARITY OF THE ROLE & RESPONSIBILITY OF POLICING INFRINGEMENTS**

A regulatory framework should include standards, operational procedures, and mechanisms for ensuring operator compliance, which may include inspections or audits and a system for addressing infringements. How this system is applied and with which organisation responsibility rests is yet known, and warrants examination.

It may be the responsibility of the accreditor, or given its recognition as a greater authority in the region, the ATCM or official designate. The voluntary scenario may have specific challenges in this respect.

## **DESIGN AND CREATION OF THE SCHEME'S WORKING ASSETS**

Some of the working assets (such as manuals, forms, templates, tracking databases etc) required for the operation of the accreditation scheme may exist in some form presently. Other materials may need to be created from scratch. It is likely that this will be the responsibility of the appointed accreditor, though if guidance is required from ATCPs this should be sought.

## **RECOMMENDATIONS**

On the basis of evidence presented in this paper, perspectives offered by stakeholders in personal communications and previously published material, a two-step process for the implementation of an accreditation scheme is proposed.

The recommendation addresses the issues highlighted previously, namely:

- minimisation of human impact caused by mainstream tourism activities
- co-ordination of site visits by all tourism vessels
- tighter interaction between the ATS and the tourism industry

### **Step One**

Launch a voluntary accreditation scheme, endorsed by the ATCM, open to all operators and managed by IAATO. If the lack of mandate appears to be preventing the scheme from achieving its objectives, negotiations should commence in parallel for the addition of new legislation – most likely a new Measure enforcing accreditation, to be enacted via the domestic legal regimes of ATCPs. Upon ratification, migration towards the mandatory scheme should commence.

### **Step Two**

Expand the accreditation scheme to encompass a broader audience (e.g. operators of small-sailing vessels and adventure expeditions), such that a greater proportion of activities contributing to cumulative impact can be managed.

### **Dependencies**

Areas for further investigation discussed in this paper, represent dependencies for the successful implementation of voluntary and mandatory schemes, and further expansion to broader audiences. It is recommended that these dependencies are addressed as a matter of priority.

## CONCLUSION

Discussion centred on the mechanism of accreditation as a tool for the regulation of tourism and the wider debate surrounding regulation of tourism more generally is still fluid. Strategic and mechanistic components of a regulatory framework are yet to be neatly inter-meshed and as such there remain some challenging disconnects between conceptual views of accreditation and what is being proposed might actually happen.

Not all scenarios for accreditation do enough to address the key issue of minimisation of cumulative impact. Others that do are realistically longer-term options due to their more intricate and complex features of implementation. This leads decision-makers to select the 'least worst' option offering best-fit to requirements.

This paper concludes that:

- Mandating an accreditation scheme is not a viable option for the short to mid-term. The precedents already set for negotiating additional legal instruments or Measures to the ATS and the huge dependencies on ATCPs to enact domestic legislation indicate a mandatory scheme is not readily implemented. It should however be considered as an option to pursue in parallel with a 'first-phase' voluntary accreditation scheme.
- Endorsement by the ATCM is proposed as a next best option to mandate – influencing operators' perceptions of future direction (and perhaps the inevitability of mandate). The greater attainable kudos of ATCM-accredited Tour Operator status, compared to that currently offered by IAATO membership may be a tempting incentive for non-IAATO operators.
- IAATO is by far the most capable and therefore most logical body to be assigned accreditation responsibilities under the auspices of the ATCM, despite any arguments for perceived bias or cliquishness amongst its members. A predictable trade-off between perceived independence of the accreditor and skills, knowledge and expertise available to manage the scheme has to be made.

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In summary, a mandatory accreditation scheme would be the most effective mechanism to address the issue of cumulative impact, but isn't viable for implementation. A voluntary, ATCM-endorsed scheme appears as the option of best-fit. It could offer all the benefits and kudos to operators of a mandated scheme and supported by a powerful message of intent (tantamount to a threat) 'encouraging' active participation from all operators. This tighter link with the ATCM and ATS could represent the beginning of the end for unregulated tourism activities in Antarctica.

The ultimate responsibility for approving activities will, however, remain with the Antarctic Treaty Consultative Parties (ATCPs) individually, through national legislation and the permitting process of mainstream tourism expeditions.

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## **APPENDICES**

### ***APPENDIX A – NEW ZEALAND POLICY STATEMENT ON TOURISM AND OTHER NON-GOVERNMENTAL ACTIVITIES IN ANTARCTICA***

Consistent with Antarctica's status as a natural reserve devoted to peace and science, and the obligation to minimise the environmental impacts of all activities, New Zealand will work within the Antarctic Treaty System to limit tourism and other non-governmental activities in Antarctica, and to ensure that where they do occur they are conducted in a safe and environmentally responsible manner by:

1. seeking the strengthening, and where appropriate the addition, of the means to manage effectively, and where necessary control, tourism and other non-governmental activities in Antarctica. A particular aim should be to ensure all such activities are assessed before commencement for the highest possible prevention of incident standards and have in place credible and effective response mechanisms should an incident occur;
2. avoiding the promotion of any further expansion of Antarctic tourism, and supporting limits on visitation of sites where cumulative impacts are likely to lead to deterioration;
3. opposing any expansion of permanent or semi-permanent land-based tourism in Antarctica, especially in the Ross Dependency;
4. continuing to limit the extent of the government support to tourist and other non-governmental expeditions to Antarctica to humanitarian assistance and basic hospitality (such as short visits to Scott base).